TSD File Inventory Index

Date: March 21, 2007

Initial: C McKeown

Facility Name:	Proviso Companies Inc. (Ave Tilden Site)
Facility Identification Number:	ILD 057 829 780

A.1 General Correspondence		**B.2 Permit Docket (B.1.2)**	
A.2 Part A / Interim Status	X	.1 Correspondence	
.1 Correspondence	X	.2 All Other Permitting Documents (Not Part of the ARA)	
.2 Notification and Acknowledgment	X	**C.1 Compliance - (Inspection Reports)**	
.3 Part A Application and Amendments	X	**C.2 Compliance/Enforcement**	
.4 Financial Insurance (Sudden, Non Sudden)		.1 Land Disposal Restriction Notifications	
.5 Change Under Interim Status Requests		.2 Import/Export Notifications	
.6 Annual and Biennial Reports		**C.3 FOIA Exemptions - Non-Releasable Documents**	
A.3 Groundwater Monitoring		**D.1 Corrective Action/Facility Assessment**	✓
.1 Correspondence		.1 RFA Correspondence	
.2 Reports		.2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure	X	.3 State Prelim. Investigation Memos	
.1 Correspondence	X	.4 RFA Reports	X
.2 Closure/Post Closure Plans, Certificates, etc	X	**D. 2 Corrective Action/Facility Investigation**	
A.5 Ambient Air Monitoring		.1 RFI Correspondence	
.1 Correspondence		.2 RFI Workplan	
.2 Reports		.3 RFI Program Reports and Oversight	
B.1 Administrative Record		.4 RFI Draft /Final Report	
		5. RFI QAPP	

Total – 1

.6 RFI QAPP Correspondence		.8 Progress Reports	
.7 Lab Data, Soil-Sampling/Groundwater		**D.5 Corrective Action/Enforcement**	
.8 RFI Progress Reports		.1 Administrative Record 3008(h) Order	
.9 Interim Measures Correspondence		.2 Other Non-AR Documents	
.10 Interim Measures Workplan and Reports		**D.6 Environmental Indicator Determinations**	
D.3 Corrective Action/Remediation Study		.1 Forms/Checklists	
.1 CMS Correspondence		**E. Boilers and Industrial Furnaces (BIF)**	
.2 Interim Measures		.1 Correspondence	
.3 CMS Workplan		.2 Reports	
.4 CMS Draft/Final Report		**F Imagery/Special Studies** (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
.5 Stabilization		**G.1 Risk Assessment**	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
.7 Lab Data, Soil-Sampling/Groundwater		.2 Compliance and Enforcement	
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
.1 CMI Correspondence		.4 Ecological - Administrative Record	
.2 CMI Workplan		.5 Permitting	
.3 CMI Program Reports and Oversight		.6 Corrective Action Remediation Study	
.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI QAPP Correspondence		.9 Environmental Justice	
1.			

Note: Transmittal Letter to Be Included with Reports.
Comments: One field site.

A.2 Part A/
Interim Status

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

JUN 1 3 1982

Charles Jones, Env. Engr.
Hopkins Agricultural Chemical Company
P.O. Box 7532
Madison, Wisconsin 53707

RE: Interim Status Acknowledgement USEPA ID No. ILD057829780
FACILITY NAME: Hopkins Agricultural Chemical Company

Dear Mr. Jones:

This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for Interim Status. Our opinion will be reevaluated on the basis of this information.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265, or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from your Part A Permit application. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR Part 122.23; your facility may operate under interim status until such time as a permit is issued or denied. This will be preceded by a request from this office or the State (if authorized) for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosure

cc: James E. Hopkins, President James W. Shelden

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

APR 20 1982

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

Mr. Charles Jones
Environmental Engineer
Hopkins Agricultural Chemical Company
P.O. Box 7532
Madison, WI 53707

RE: Interim Status Acknowledgement USEPA ID No. ILD057829780
FACILITY NAME: Hopkins Agricultural Chemical Company

Dear Mr. Jones:

This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for Interim Status. Our opinion will be reevaluated on the basis of this information.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265, or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from your Part A Permit application. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR Part 122.23; your facility may operate under interim status until such time as a permit is issued or denied. This will be preceded by a request from this office or the State (if authorized) for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

6/10/82

4/16/82

Enclosure

cc: James E. Hopkins, President
James W. Shelden

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved. OMB No. 2050-0028 Expires 10-31-99

Notification of Regulated Waste Activity

EPA United States Environmental Protection Agency

Please refer to Section V. Line-by-Line Instructions for Completing EPA Form 8700-12 before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).

RECEIVED
JAN - 7 1999
PROGRAM MANAGEMENT BRANCH
U.S. EPA - REGION 5

Date Received (For Official Use Only)

20103000055

I. Installation's EPA ID Number *(Mark 'X' in the appropriate box)*

☐ A. Initial Notification ☒ B. Subsequent Notification *(Complete item C)*

C. Installation's EPA ID Number: ILD057829780

II. Name of Installation *(Include company and specific site name)*

HOPKINS AG CHEM CO. & DBA CO.

III. Location of Installation *(Physical address not P.O. Box or Route Number)*

Street: 4801 SHEPARD TRAIL

Street *(Continued)*:

City or Town: ROCKFORD | State: IL | Zip Code: 61103 –

County Code: 201 | County Name: WINNEBAGO

IV. Installation Mailing Address *(See instructions)*

Street or P.O. Box:

City or Town: | State: | Zip Code: –

V. Installation Contact *(Person to be contacted regarding waste activities at site)*

Name *(Last)*: | *(First)*:

Job Title: | Phone Number *(Area Code and Number)*: – –

VI. Installation Contact Address *(See instructions)*

A. Contact Address Location ☐ Mailing ☐ | B. Street or P.O. Box:

City or Town: | State: | Zip Code: –

VII. Ownership *(See instructions)*

A. Name of Installation's Legal Owner:

RECEIVED
MAY 13 1999
RCRA RECORDS ROOM
Waste, Pesticides & Toxics Division
U. S. EPA — REGION 5

Street, P.O. Box, or Route Number:

City or Town: | State: | Zip Code: –

Phone Number *(Area Code and Number)*: – – | B. Land Type: | C. Owner Type: | D. Change of Owner Indicator: Yes ☐ No ☐ | (Date Changed) Month Day Year:

already closed — ok

ID - For Official Use Only

VIII. Type of Regulated Waste Activity *(Mark 'X' in the appropriate boxes. Refer to Instructions)*

A. Hazardous Waste Activity

1. Generator (See Instructions)
   - [ ] a. Greater than 1000kg/mo (2,200 lbs.)
   - [ ] b. 100 to 1000 kg/mo (220-2,200 lbs.) 20 ↑
   - [ ] c. Less than 100 kg/mo (220 lbs) ↓20
2. Transporter (Indicate Mode in boxes 1-5 below)
   - [ ] a. For own waste only
   - [ ] b. For commercial purposes

Mode of Transportation
- [ ] 1. Air
- [ ] 2. Rail
- [ ] 3. Highway
- [ ] 4. Water
- [ ] *5. Other - specify*

- [ ] 3. Treater, Storer, Disposer (at installation) Note: A permit is required for this activity, see instructions.
4. Hazardous Waste Fuel
   - [ ] a. Generator Marketing to Burner
   - [ ] b. Other Marketers
   - [ ] c. Boiler and/or Industrial Furnace
     - [ ] 1. Smelter Deferral
     - [ ] 2. Small Quantity Exemption

   Indicate Type of Combustion Device(s)
   - [ ] 1. Utility Boiler
   - [ ] 2. Industrial Boiler
   - [ ] 3. Industrial Furnace
- [ ] 5. Underground Injection Control

B. Used Oil Recycling Activities

1. Used Oil Recycling Marketer
   - [ ] a. Marketer Directs Shipment of Used Oil to Off-Specification Burner
   - [ ] b. Marketer Who First Claims the Used Oil Meets the Specifications
2. Used Oil Burner - Indicate Type(s) of Combustion Device
   - [ ] a. Utility Boiler
   - [ ] b. Industrial Boiler
   - [ ] c. Industrial Furnace
3. Used Oil Transporter - Indicate Type(s) of Combustion Device(s)
   - a. Transporter
   - b. Transfer Facility
4. Used Oil Processor/Re-refiner - Indicate Type(s) of Activity(ies)
   - [ ] a. Process
   - [ ] b. Re-refine

IX. Description of Regulated Wastes *(Use additional sheets if necessary)*

A. Characteristics of Nonlisted Hazardous Wastes. *(Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles; See 40 CFR Parts 261.20 - 261.24)*

1. Ignitable *(D001)*	2. Corrosive *(D002)*	3. Reactive *(D003)*	4. Toxicity Characteristic	(List specific EPA hazardous waste number(s) for the Toxicity characteristic contaminant(s))

B. Listed Hazardous Wastes. *(See 40 CFR 261.31 - 33; See instructions if you need to list more than 12 waste codes.)*

1	2	3	4	5	6
7	**8**	**9**	**10**	**11**	**12**

C. Other Wastes. *(State or other wastes requiring a handler to have an I.D. number; See instructions.)*

1	2	3	4	5	6

X. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature	Name and Official Title *(Type or print)*	Date Signed
Joan McMullen (No one available	to sign) IEPA	12/28/98

XI. Comments

This facility is out of business and has been gone for 2 or 3 years. ID # should be deleted.

Note: Mail completed form to the appropriate EPA Regional or State Office. *(See Section III of the booklet for addresses.)*

AS

NN7-per Comments

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved, OMB No. 2050-0028 Expires 10/31/99
GSA No. 0246-EPA-OT

Please refer to Section V. Line-by-Line Instructions for Completing EPA Form 8700-12 before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).

Notification of Regulated Waste Activity

EPA United States Environmental Protection Agency

RECEIVED
DEC 09 1998
U.S. EPA REGION V

Date Received (For Official Use Only)

2010300055

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

☐ A. Initial Notification ☒ B. Subsequent Notification (Complete item C)

C. Installation's EPA ID Number: ILD057829780

II. Name of Installation (Include company and specific site name)

HOPKINS AG CHEM CO. & DBA CO.

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street: 4801 SHEPARD TRAIL

RECEIVED
DEC 23 1998
RCRA RECORDS ROOM
Waste, Pesticides & Toxics Division
U.S. EPA - REGION 5

Street (Continued):

City or Town: ROCKFORD

State: IL

Zip Code: 61103-

County Code: 201

County Name: WINNEBAGO

IV. Installation Mailing Address (See instructions)

Street or P.O. Box:

City or Town:

State:

Zip Code:

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (Last):

(First):

Job Title:

Phone Number (Area Code and Number): – –

VI. Installation Contact Address (See instructions)

A. Contact Address Location ☐ Mailing ☐

B. Street or P.O. Box:

City or Town:

State:

Zip Code:

VII. Ownership (See instructions)

A. Name of Installation's Legal Owner

RECEIVED
DEC 01 1998

Street, P.O. Box, or Route Number:

City or Town:

State:

Zip Code:

Phone Number (Area Code and Number): – –

B. Land Type: P

C. Owner Type: P

D. Change of Owner (Indicator): Yes ☐ No ☒

(Date Changed) Month Day Year

RCRIS ENTRY DEC 16 1998

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved, OMB No. 2050-0028 Expires 10/31/99
GSA No. 0246-EPA-OT

ID - For Official Use Only

VIII. Type of Regulated Waste Activity *(Mark 'X' in the appropriate boxes. Refer to Instructions)*

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1. Generator (See Instructions)
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   - ☐ b. 100 to 1000 kg/mo (220-2,200 lbs.)
   - ☐ c. Less than 100 kg/mo (220 lbs)
2. Transporter (Indicate Mode in boxes 1-5 below)
   - ☐ a. For own waste only
   - ☐ b. For commercial purposes

Mode of Transportation
- ☐ 1. Air
- ☐ 2. Rail
- ☐ 3. Highway
- ☐ 4. Water
- ☐ *5. Other - specify*

☐ 3. Treater, Storer, Disposer (at installation) Note: A permit is required for this activity, see instructions.

4. Hazardous Waste Fuel
   - ☐ a. Generator Marketing to Burner
   - ☐ b. Other Marketers
   - ☐ c. Boiler and/or Industrial Furnace
     - ☐ 1. Smelter Deferral
     - ☐ 2. Small Quantity Exemption

   Indicate Type of Combustion Device(s)
   - ☐ 1. Utility Boiler
   - ☐ 2. Industrial Boiler
   - ☐ 3. Industrial Furnace

☐ 5. Underground Injection Control

B. Used Oil Recycling Activities

1. Used Oil Recycling Marketer
   - ☐ a. Marketer Directs Shipment of Used Oil to Off-Specification Burner
   - ☐ b. Marketer Who First Claims the Used Oil Meets the Specifications
2. Used Oil Burner - Indicate Type(s) of Combustion Device
   - ☐ a. Utility Boiler
   - ☐ b. Industrial Boiler
   - ☐ c. Industrial Furnace
3. Used Oil Transporter - Indicate Type(s) of Combustion Device(s)
   - a. Transporter
   - b. Transfer Facility
4. Used Oil Processor/Re-refiner - Indicate Type(s) of Activity(ies)
   - ☐ a. Process
   - ☐ b. Re-refine

IX. Description of Regulated Wastes *(Use additional sheets if necessary)*

A. Characteristics of Nonlisted Hazardous Wastes. *(Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles; See 40 CFR Parts 261.20 - 261.24)*

1. Ignitable *(D001)*	2. Corrosive *(D002)*	3. Reactive *(D003)*	4. Toxicity Characteristic	(List specific EPA hazardous waste number(s) for the Toxicity characteristic contaminant(s))
☐	☐	☐	☐	

B. Listed Hazardous Wastes. *(See 40 CFR 261.31 - 33; See instructions if you need to list more than 12 waste codes.)*

1	2	3	4	5	6
7	8	9	10	11	12

C. Other Wastes. *(State or other wastes requiring a handler to have an I.D. number; See instructions.)*

1	2	3	4	5	6

X. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature	Name and Official Title *(Type or print)*	Date Signed
(No one available	to sign)	

XI. Comments

This facility is out of business and has been gone for 2 or 3 years. ID # should be deleted.

Note: Mail completed form to the appropriate EPA Regional or State Office. *(See Section III of the booklet for addresses.)*

Please print or type with ELITE type (12 characters/inch) in the unshaded areas only.

Form Approved OMB No. 158-S79016
GSA No. 0246-EPA-OT

EPA — U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTRUCTIONS: .. you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law *(Section 3010 of the Resource Conservation and Recovery Act).*

INSTALLATION'S EPA I.D. NO. ILD057829780 ~~ILD005249255~~

I. NAME OF INSTALLATION ~~ROBERTS DR LABORATORIES INC~~ 000439 AUG 22 80

II. INSTALLATION MAILING ADDRESS
4995 N MAIN ST
ROCKFORD, IL 61103

III. LOCATION OF INSTALLATION
4995 N MAIN ST
ROCKFORD, IL 61103

FOR OFFICIAL USE ONLY

COMMENTS:

INSTALLATION'S EPA I.D. NUMBER	APPROVED	DATE RECEIVED (yr., mo., & day)
ILD057829780	A	80 08 18

I. NAME OF INSTALLATION
HOPKINS AG CHEM & DBA - COLE, ROBERTS, CROWN

II. INSTALLATION MAILING ADDRESS
STREET OR P.O. BOX: 4995 N MAIN ST

CITY OR TOWN: ROCKFORD — ST.: IL — ZIP CODE: 61103

III. LOCATION OF INSTALLATION
STREET OR ROUTE NUMBER: 4995 N MAIN ST

CITY OR TOWN: ROCKFORD — ST.: IL — ZIP CODE: 61103

IV. INSTALLATION CONTACT
NAME AND TITLE (last, first, & job title): HUBER DANIEL PLANT MANAGER

PHONE NO. (area code & no.): 815-877-6076

V. OWNERSHIP
A. NAME OF INSTALLATION'S LEGAL OWNER: LEASED TO HOPKINS AGRICULTURAL CHEM CO

B. TYPE OF OWNERSHIP (enter the appropriate letter into box): M

F = FEDERAL
M = NON-FEDERAL

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))
- [X] A. GENERATION
- [X] B. TRANSPORTATION (complete Item VII)
- [X] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only – enter "X" in the appropriate box(es))
- [ ] A. AIR
- [ ] B. RAIL
- [X] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION
Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

- [X] A. FIRST NOTIFICATION
- [ ] B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.: ILD057829780

IX. DESCRIPTION OF HAZARDOUS WASTES
Please go to the reverse of this form and provide the requested information.

AUG 19 1980

CONTINUE ON REVERSE

I.D. – FOR OFFICIAL USE ONLY

1	2–13	T/A 14	C 15
W	ILD057829780	2	1

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed hazardous waste from non–specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F002	F003	F005			
7	**8**	**9**	**10**	**11**	**12**

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	**20**	**21**	**22**	**23**	**24**
25	**26**	**27**	**28**	**29**	**30**

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
P001	P004	P006	P020	P022	P024
37	**38**	**39**	**40**	**41**	**42**
P035	P037	P039	P044	P050	P051
43	**44**	**45**	**46**	**47**	**48**
P056	P059	P066	P069	P071	P088 *

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON–LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non–listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

[X] 1. IGNITABLE (D001) [X] 2. CORROSIVE (D002) [ ] 3. REACTIVE (D003) [X] 4. TOXIC (D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
William M. Mahlburg	William M. Mahlburg Regulatory Compliance Specialist	August 15, 1980

* Continued						
	U002	U057	U112	U166	U231	U127
P089	U003	U067	U114	U188	U232	U185
P090	U011	U041	U115	U192	U233	
P094	U019	U077	U116	U197	U239	
P097	U029	U080	U122	U211	U051	
P100	U031	U083	U140	U220	U052	
P117	U036	U084	U148	U224	U054	
P122	U037	U089	U154	U230	U139	

EPA

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act *(RCRA)*. Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER ➤ ILD057829780

HOPKINS AG CHEM CO DBA COLE CHEM SUPPLY
P.O. BOX 7532
MADISON, WI 53707

INSTALLATION ADDRESS ➤

4801 SHEPHERD TRAIL
ROCKFORD, IL 61103

EPA Form 8700-12B (4-80)

07/07/82

M 7-7-82

EPA

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

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EPA I.D. NUMBER ➤ ILD057829780 REACKNOWLEDGEMENT

HOPKINS AG CHEM CO & DBA COLE RBT CROWN
PO BOX 7532 537 ATLAS AVE
MADISON WI 53707

INSTALLATION ADDRESS ➤

4995 N MAIN ST
ROCKFORD IL 61103

EPA Form 8700-12B (4-80)

09/28/81

EPA

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act *(RCRA)*. Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER ➤ ILD057829780 REACKNOWLEDGEMENT

HOPKINS AG CHEM CO & DBA COLE ~~ROT C~~
PO BOX 7532 537 ATLAS AVE
MADISON WI 53707

INSTALLATION ADDRESS ➤ 4801 Shepherd Trail
~~4945 N MAIN ST~~ CLOSED FACILITY
ROCKFORD IL 61103

EPA Form 8700-12A (4-80)

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:

RCRA ACTIVITIES

Date: April 30, 1982

To: Mr. Charles Jones
Environmental Engineer
Hopkins Agricultural Chemical Co.
P.O. Box 7532
Madison, Wisconsin 53707

In response to your request of March 31, 1982 with regard to the following installation:

EPA I D # ILD057829780

the following action has been taken:

Because the changes requested in your letter will affect your Part A permit application, the signatory must be a Vice President or above. Please have this letter signed and then return it for processing to:

EPA Region V
RCRA Activities
P.O. Box A3587
Chicago IL 60690

Thank-you for your cooperation.

Sincerely,

Arthur S. Kawatachi
Regional Project Officer

(2)

Hopkins

HOPKINS AGRICULTURAL CHEMICAL CO.
P.O. Box 7532, Madison, WI 53707
(608) 222-0624 • TWX 910 286 2731

March 31, 1982

U.S. Environmental Protection Agency
Region V - RCRA Management Branch
230 South Dearborn St.
Chicago, IL 60604

RE: ILD 057829780
9 T 75DP4

Dear Sir:

Two changes have occured and need to be updated on the RCRA records.

Hopkins Agricultural Chemical Co. and Doing Business as Cole Roberts has changed to:

Hopkins Agricultural Chemical Co. and DBA Cole Chemical Supply.

Roberts laboratory ILD005249255 was incorporated into the Hopkins Agricultural Chemical Co. ILD057829780

The second change is the installation address. The street name and number was changed by the US Postal Service.

Old address:

4995 N. Main St.
Rockford, IL 61103

New address:

4801 Shepherd Trail
Rockford, IL 61103

A copy of the notification changes is included.

RECEIVED
4/02/RL

RECEIVED
APR 2 1982
WASTE MANAGEMENT BRANCH
EPA, REGION V

If there are any questions, please contact my office at 608/222-0624.

Sincerely,

HOPKINS AGRICULTURAL CHEMICAL CO.

Charles Jones
Environmental Engineer

enclosure

cc: Illinois EPA
RCRA Management Branch
2200 Churchill Road
Springfield, IL 62706

JAMES E. HOPKINS, PRESIDENT

Hopkins

HOPKINS AGRICULTURAL CHEMICAL CO.
P.O. Box 7532, Madison, WI 53707
(608) 222-0624 • TWX 910 286 2731

March 31, 1982

Address changed
4-23-82 MGP

EPA - Region V
RCRA Activities
Box 7861
Chicago, IL 60680

RE: ILD 005249255

not on P.O.

Roberts Dr Laboratories Inc. was a division of Hopkins Agricultural Chemical Co. doing business as Roberts Lab (ILD 005249255).

This division has been incorporated into the Hopkins Agricultural Chemical Co. The name has been dropped and all business is now under the business of Hopkins Agricultural Chemical Co. (ILD 057829780). q TTSD PA

A copy of the EPA printout received is attached. The address change was a street name change by the U.S. postal service.

Any questions, please contact my office at 608/222-0624.

Sincerely,

HOPKINS AGRICULTURAL CHEMICAL CO.

Charles P. Jones
Charles P. Jones
Environmental Engineer

enclosure

cc: Illinois EPA
RCRA Management Branch
2200 Churchill Road
Springfield, IL 62706

RECEIVED
WASTE MANAGEMENT BRANCH
REGION V

RECEIVED
4/07/82

EPA - REGION V
RCRA ACTIVITIES
P.O. BOX 7861
CHICAGO, IL 60680

ILD005249255

ROBERTS DR LABORATORIES INC
~~4395 N MAIN ST~~
ROCKFORD, IL 61103

4801 Shepherd Trail
~~4395 N MAIN ST~~
ROCKFORD, IL 61103

Hopkins

HOPKINS AGRICULTURAL CHEMICAL CO.
P.O. Box 7532, Madison, WI 53707
(608) 222-0624 • TWX 910 286 2731

ILD057829780
OK

March 27, 1981

Ms. Denise Steckly
EPA Region 5
RCRA Activities
P.O. Box A3587
Chicago, IL 60690

Dear Ms. Steckly:

The Federal General Information form (EPA Form 3510-1 (6-80) line 5 reading "Northrock Industrial Park" is an acceptable address for the site. However, "4995 N. Main St." is a corrected address and is also acceptable.

Any questions please contact my office.

Sincerely,

HOPKINS AGRICULTURAL CHEMICAL CO.

Charles P. Jones

Charles P. Jones
Environmental Engineer

SUB./PART A

CPJ:nb

Enc.

MAR 30 1981

Please print or type in the unshaded areas only
(fill—in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-R0175

FORM 1 GENERAL

U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

EPA I.D. NUMBER: F ILD057829780 (T/A: 3, C/D)

LABEL ITEMS

I. EPA I.D. NUMBER

III. FACILITY NAME

V. FACILITY MAILING ADDRESS

VI. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill—in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill—in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold—faced terms.

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a **publicly owned treatment works** which results in a **discharge to waters of the U.S.**? (FORM 2A)		X	
B. Does or will this facility *(either existing or proposed)* include a **concentrated animal feeding operation** or **aquatic animal production facility** which results in a **discharge to waters of the U.S.**? (FORM 2B)		X	
C. Is this a facility which currently results in **discharges to waters of the U.S.** other than those described in A or B above? (FORM 2C)		X	
D. Is this a proposed facility *(other than those described in A or B above)* which will result in a **discharge to waters of the U.S.**? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of **hazardous wastes**? (FORM 3)	X		X
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed **stationary source** which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	
J. Is this facility a proposed **stationary source** which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP: HOPKINS AG CHEM & DBA COLE, ROBERTS, CROWN

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title): JONES CHARLES ENVIRON ENGR

B. PHONE (area code & no.): 608 222 0624

2 HUBER DANIEL PLANT MANAGER 815 877 6076

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX

3 ~~PO 7532 577~~ ~~4995 N MAIN ST~~ ATLAS AVE

B. CITY OR TOWN	C. STATE	D. ZIP CODE
4 ROCKFORD MADISON	~~WI~~ IL	~~61103~~ 53707

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

5 ~~NORTHROCK INDUSTRIAL PARK~~ ~~4995 W. Main St~~ 4801 Skepherd Trail

B. COUNTY NAME

WINNEBAGO

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE (if known)
6 ROCKFORD	IL	61103	201

NOV 18 1980

CONTINUE ON REVERSE

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST	B. SECOND
2879 (specify) FORMULATION OF AGRICULTURAL CHEMICALS	(specify)
C. THIRD	**D. FOURTH**
(specify)	(specify)

VIII. OPERATOR INFORMATION

A. NAME: HOPKINS AGRICULTURAL CHEMICAL COMPANY

B. Is the name listed in Item VIII-A also the owner? ☐ YES ☒ NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)
F = FEDERAL; S = STATE; P = PRIVATE; M = PUBLIC (other than federal or state); O = OTHER (specify)
P (specify)

D. PHONE (area code & no.): 608 222 0624

E. STREET OR P.O. BOX: PO BOX 7532

F. CITY OR TOWN: MADISON

G. STATE: WI

H. ZIP CODE: 53707

IX. INDIAN LAND

Is the facility located on Indian lands? ☐ YES ☒ NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water): 9 N	D. PSD (Air Emissions from Proposed Sources): 9 P
B. UIC (Underground Injection of Fluids): 9 U	E. OTHER (specify): 9 Z IL Z01030AXP (specify) DUST COLLECTOR
C. RCRA (Hazardous Wastes): 9 R	E. OTHER (specify): 9 (specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements. F9:A/50

XII. NATURE OF BUSINESS (provide a brief description)

FORMULATION AND PACKAGING OF DRY PESTICIDES, LIQUID PESTICIDES AND RELATED PRODUCTS F9:A/51

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments; and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
JAMES E. HOPKINS, PRESIDENT	James E Hopkins	11/17/87

COMMENTS FOR OFFICIAL USE ONLY

Please print or type in the unshaded areas only
(fill—in areas are spaced for elite type, i.e., 12 characters/inch).

ID NO. NOT RECEIVED AS OF FILING

Form Approved OMB No. 158-S80004

FORM 3 RCRA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

EPA I.D. NUMBER: F 1 L 0 0 5 7 8 2 9 7 8 0 T/A 3 1 C

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

☒ 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

C 8 — FOR EXISTING FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

YR.	MO.	DAY
79	03	01

JB6

☐ 2. NEW FACILITY *(Complete item below.)*

FOR NEW FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR.	MO.	DAY

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

☐ 1. FACILITY HAS INTERIM STATUS

☐ 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES — CODES AND DESIGN CAPACITIES

A. PROCESS CODE — Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. PROCESS DESIGN CAPACITY — For each code entered in column A enter the capacity of the process.

1. AMOUNT — Enter the amount.
2. UNIT OF MEASURE — For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S02	600	G	
X-2	T03	20	E	
1	S01	44,000,000	G	
2	T04	5500,000	U	
3				
4				

C DUP T/A 3 1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
5				
6				
7				
8				
9				
10				

Do not use

Continued from the front.

III. PROCESSES *(continued)*

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES *(code "104")*. FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

CHEMICAL DEGRADATION TREATMENTS IN DRUMS.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four–digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four–digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non–listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non–listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non–listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non–listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1): S W 1 L D 0 5 7 8 2 9 7 8 0 T/A 3 C 1

FOR OFFICIAL USE ONLY: S W DUP T/A 3 C 2 DUP

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	P001	27,250000	P	S01 T04	
~~2~~ 7	P044	220000	P	S01 T04	
~~3~~ 8	U239				INCLUDED WITH LINE 2
~~4~~ 7	U057				INCLUDED WITH LINE 2
5	P122	660000	P	S01 T04	
~~6~~	~~D000~~	~~440000~~	~~P~~	~~S01 T04~~	
~~7~~ 4	~~D000~~	~~22,000000~~	~~P~~	~~S01 T04~~	
~~8~~ 7	D001				INCLUDED WITH LINE 7
9	U002	550.000	P	S01 T04	
10	U041	110.000	P	S01 T04	
~~11~~	~~D000~~	~~11,000000~~	~~G~~	~~S01 T04~~	
~~11~~ 2	D001	110,000.000	P	S01 T04	INCLUDED WITH LINE 11
~~11~~ 13	U041				INCLUDED WITH LINE 11
14	U089	550.000	P	S01 T04	
15	U154	550.000	P	S01 T04	
16	U188	110.000	P	S01 T04	
~~17~~	~~D000~~	~~825000~~	~~G~~	~~S01 T04~~	
~~17~~ 18	F003	8250.000	P	S01 T04	INCLUDED WITH LINE 17
~~17~~ 19	D013				INCLUDED WITH LINE 17
20					
21					
22					
23					
24					
25					
26					

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WASTE (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

NOT APPLICABLE

EPA I.D. NO. (enter from page 1)

F	I	L	D	0	5	7	8	2	9	7	8	0	3	6

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail).* F6; A/55

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground-level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail).* F 6; B/56

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)	LONGITUDE (degrees, minutes, & seconds)
42 19 55.00	089 04 27.00

VIII. FACILITY OWNER

☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. (area code & no.)
E HESS AND HOPKINS CENTER	815-877-2526

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
F 4995 N. MAIN STREET	G ROCKFORD	IL	61103

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
JAMES W. SHELDEN		11-17-80

X. OPERATOR CERTIFICATION

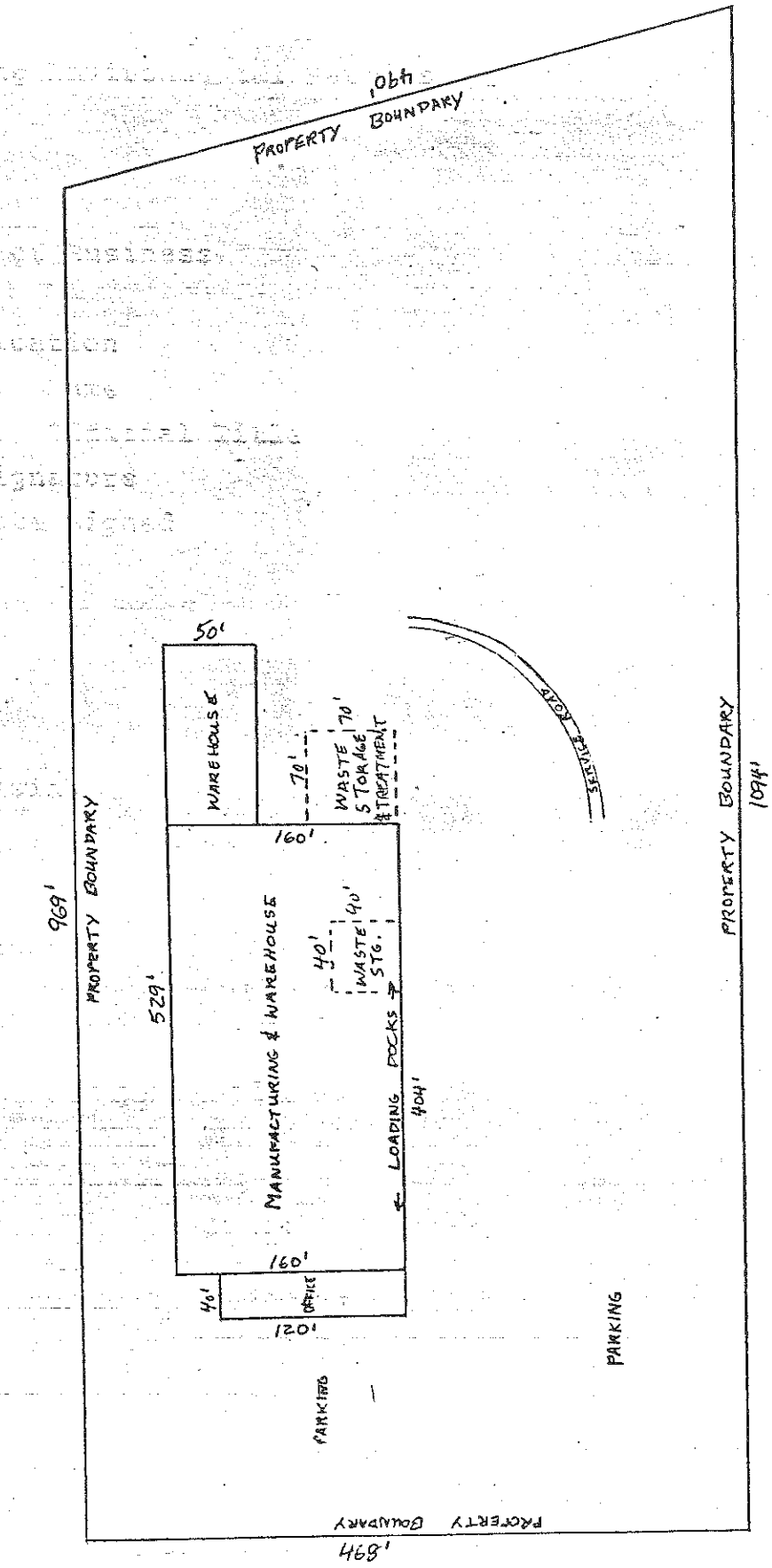
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
JAMES E. HOPKINS	James E Hopkins	11/17/80

Form Approved OMB No. 158-S80004

580

V. FACILITY DRAWING *(see page 4)*



SCALE: 1 INCH = 125 FEET

HOPKINS AGRICULTURAL CHEMICAL CO.
ROCKFORD, ILLINOIS

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

NOT APPLICABLE

EPA I.D. NO. (enter from page 1)

F	I	L	D	0	5	7	8	2	9	7	8	Ø	3	6

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail).* F6: A/55

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground-level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail).* F 6: B/56

V ACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)	LONGITUDE (degrees, minutes, & seconds)
42 19 55 Ø	Ø89 Ø4 27 Ø

VIII. FACILITY OWNER

☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. (area code & no.)
E HESS AND HOPKINS CENTER	815-877-2526

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
F 4995 N. MAIN STREET	G ROCKFORD	IL	61103

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
JAMES W. SHELDEN		11-17-86

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

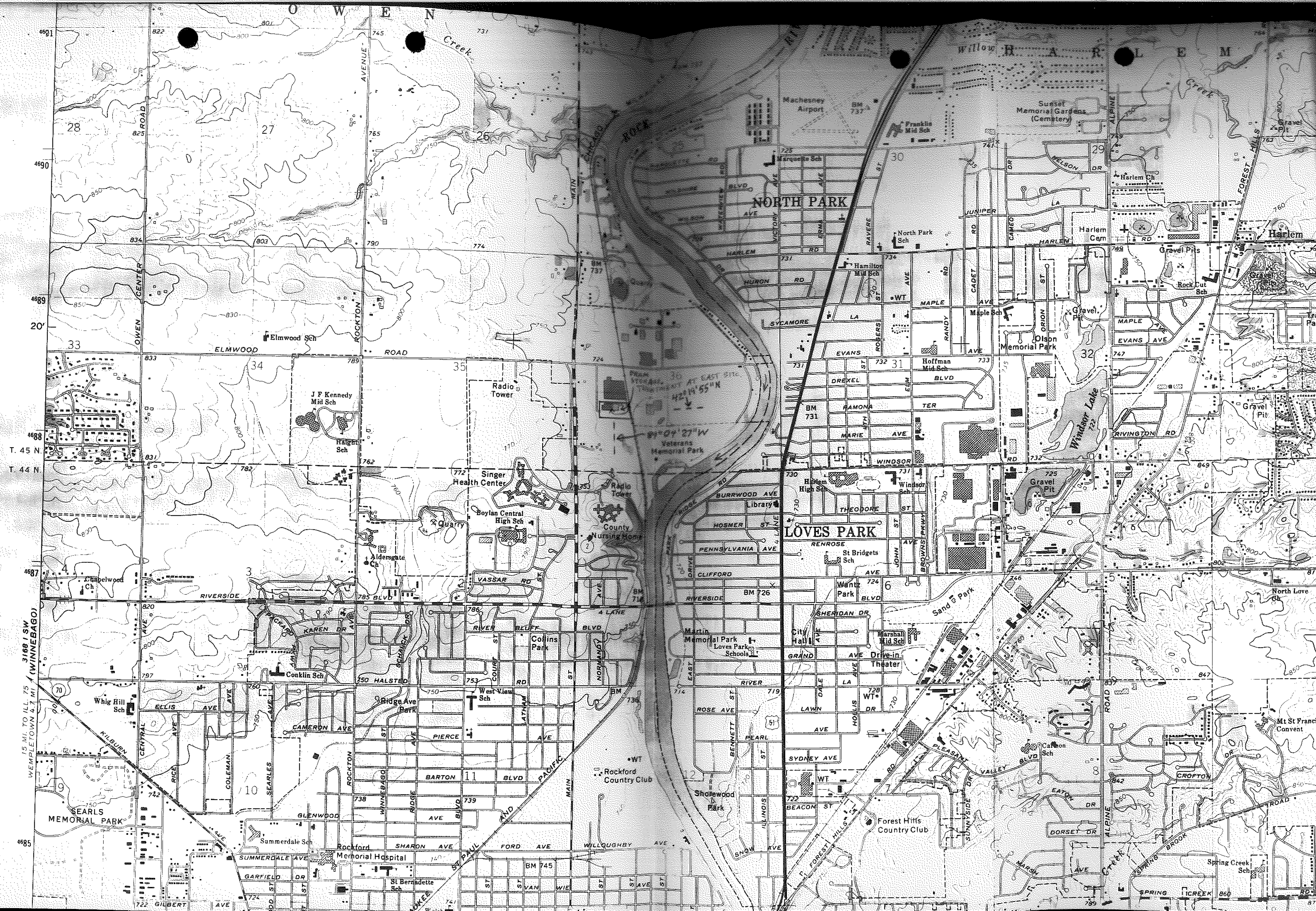
A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
JAMES E. HOPKINS	James E Hopkins	11/17/86

EPA I.D. NUMBER (enter from page 1): W I L D 0 5 7 8 2 9 7 8 0 | T/A: 3 | C: 1

FOR OFFICIAL USE ONLY: S: W | DUP | T/A: 3 2 | DUP

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	P001	27,250	PG	S01 T04	
002 2	F044	220,000	PG	S01 T04	
003 3	U239				INCLUDED WITH LINE 2
004 4	U057				INCLUDED WITH LINE 2
5	P122	660	PG	S01 T04	
6	D000	44,000,000	G	S01 T04	
7	D000	22,000,000	G	S01 T04	
8	D001	220,000	P	S01 T04	INCLUDED WITH LINE 7
9	U002	550	PG	S01 T04	
10	U041	110	PG	S01 T04	
11	D000	11,000,000	G	S01 T04	
012 12	D001	11,000		S01 T04	INCLUDED WITH LINE 11
013 13	U041				INCLUDED WITH LINE 11
14	U089	550	PG	S01 T04	
15	U154	5500	PG	S01 T04	
16	U188	1100	PG	S01 T04	
17	D000	825,000	G	S01 T04	
018 18	F003	82,500	P	S01 T04	INCLUDED WITH LINE 17
019 19	D013				INCLUDED WITH LINE 17
20					
21					
22					
23					
24					
25					
26					



O W E N
H A R L E M
Creek
Willow
ROCK RIVER
Machesney Airport
BM 737
Franklin Mid Sch
Marquette Sch
NORTH PARK
Sunset Memorial Gardens (Cemetery)
Harlem Ch
Harlem Cem
Harlem
North Park Sch
Hamilton Mid Sch
Gravel Pits
Gravel Pit
Rock Cut Sch
Maple Sch
Olson Memorial Park
Hoffman Mid Sch
Windsor Lake
Elmwood Sch
J F Kennedy Mid Sch
Haight Sch
Radio Tower
Veterans Memorial Park
Singer Health Center
Boylan Central High Sch
Quarry
Aldersgate Ch
Chapelwood Ch
County Nursing Home
Harlem High Sch
Windsor Sch
Library
LOVES PARK
St Bridgets Sch
Wantz Park
Sand Park
Marshall Mid Sch
City Hall
Martin Memorial Park
Loves Park Schools
Drive-in Theater
Collins Park
Conklin Sch
Whig Hill Sch
West View Sch
Ridge Ave Park
Rockford Country Club
Shorewood Park
Forest Hills Country Club
Carlson Sch
North Love Sch
Mt St Francis Convent
Spring Creek Sch
SEARLS MEMORIAL PARK
Summerdale Sch
Rockford Memorial Hospital
St Bernadette Sch
T. 45 N.
T. 44 N.
20′
3168 I SW (WINNEBAGO)
15 MI. TO ILL. 75
WEMPLETOWN 4.7 MI.
ELMWOOD ROAD
OWEN CENTER ROAD
ROCKTON AVENUE
RIVERSIDE BLVD
RIVER BLUFF BLVD
HALSTED RD
KILBURN AVE
PLEASANT VALLEY BLVD
FOREST HILLS RD
ALPINE ROAD
SPRING BROOK ROAD
SPRING CREEK RD
CHICAGO MILWAUKEE ST PAUL AND PACIFIC

Please print or type in the unshaded areas only
(fill–in areas are spaced for elite type, i.e., 12 characters/inch).

ID NO. NOT RECEIVED AS OF FILING DATE 5-80

Form Approved OMB No. 158-S80004

FORM 3 RCRA

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY
HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER

S F ILD057829780 T/A 3 C 1

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

[X] 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

C 8 — YR. 69 MO. 03 DAY 01 — FOR EXISTING FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)* JBG

[ ] 2. NEW FACILITY *(Complete item below.)*

YR. — MO. — DAY — FOR NEW FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR IS EXPECTED TO BEGIN

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

[ ] 1. FACILITY HAS INTERIM STATUS

[ ] 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES – CODES AND DESIGN CAPACITIES

A. PROCESS CODE – Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. PROCESS DESIGN CAPACITY – For each code entered in column A enter the capacity of the process.
1. AMOUNT – Enter the amount.
2. UNIT OF MEASURE – For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

S C DUP T/A 3 C 1

LINE NUMBER	A. PROCESS CODE (from list above)	B. 1. AMOUNT (specify)	B. 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. 1. AMOUNT	B. 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
~~X-1~~	~~S 0 2~~	~~600~~	~~G~~		5				
~~X-2~~	~~T 0 3~~	~~20~~	~~E~~		6				
1	S01	44,000 000	G		7				
2	T04	5500 000	U		8				
3					9				
4					10				

Continued from the front.

III. PROCESSES *(continued)*

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES *(code "T04")*. FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

CHEMICAL DEGRADATION TREATMENTS IN DRUMS.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. **EPA HAZARDOUS WASTE NUMBER** – Enter the four–digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four–digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. **ESTIMATED ANNUAL QUANTITY** – For each **listed waste** entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each **characteristic** or **toxic contaminant** entered in column A estimate the total annual quantity of all the non–listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. **UNIT OF MEASURE** – For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. **PROCESSES**

1. PROCESS CODES:
   For listed hazardous waste: For each **listed** hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non–listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate **all** the processes that will be used to store, treat, and/or dispose of all the non–listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non–listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO *(enter code)*	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE *(enter code)*	D. PROCESSES 1. PROCESS CODES *(enter)*	D. PROCESSES 2. PROCESS DESCRIPTION *(if a code is not entered in D(1))*
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				*included with above*

Please print or type in the unshaded areas only
(fill-in areas are spaced for elite type, i.e., 12 characters/inch).

ID NO. NOT RECEIVED AS OF FILING DATE 580

Form Approved OMB No. 158-R0175

FORM 1 GENERAL

U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER

F ILD057829780 (T/A:) C: D

LABEL ITEMS

I. EPA I.D. NUMBER

III. FACILITY NAME

V. FACILITY MAILING ADDRESS

VI. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill—in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill—in area*(s)* below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a **publicly owned treatment works** which results in a **discharge** to **waters of the U.S.**? (FORM 2A)		X	
B. Does or will this facility *(either existing or proposed)* include a **concentrated animal feeding operation** or **aquatic animal production facility** which results in a **discharge** to **waters of the U.S.**? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to **waters of the U.S.** other than those described in A or B above? (FORM 2C)		X	
D. Is this a proposed facility *(other than those described in A or B above)* which will result in a **discharge** to **waters of the U.S.**? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of **hazardous wastes**? (FORM 3)	X		X
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed **stationary source** which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	
J. Is this facility a proposed **stationary source** which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)			X

III. NAME OF FACILITY

C 1 SKIP: HOPKINS AG CHEM & DBA COLE, ROBERTS, CROWN

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*	B. PHONE *(area code & no.)*		
C 2 HUBER DANIEL PLANT MANAGER	815	877	6076

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX

C 3 4995 N MAIN ST.

B. CITY OR TOWN	C. STATE	D. ZIP CODE
C 4 ROCKFORD	IL	61103

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

C 5 (NORTHROCK INDUSTRIAL PARK) is the area

4995 N. Main St is correct add.

B. COUNTY NAME

WINNEBAGO

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE *(if known)*
C 6 ROCKFORD	IL	61103	

EPA Form 3510-1 (6-80)

NOV 18 1980

CONTINUE ON REVERSE

Please print or type in the unshaded areas only
(fill-in areas are spaced for elite type, i.e., 12 characters/inch).

ID NO. NOT RECEIVED AS OF FILING DATE 580

Form Approved OMB No. 158-R0175

FORM 1 GENERAL

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER

F ILD057829780 3 D

LABEL ITEMS

- EPA I.D. NUMBER
- III. FACILITY NAME
- V. FACILITY MAILING ADDRESS
- VI. FACILITY LOCATION

HOPKINS AGRICULTURAL CHEMICAL CO
MAILBOX P.O. 7532 537 ATLAS AVE
PLEASE PLACE LABEL IN THIS SPACE
MADISON, WIS 53707

4995 W MAIN ST
ROCKFORD, IL 61103

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill—in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill—in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of **bold—faced terms.**

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a **publicly owned treatment works** which results in a **discharge** to **waters of the U.S.**? (FORM 2A)		X	
B. Does or will this facility *(either existing or proposed)* include a **concentrated animal feeding operation** or **aquatic animal production facility** which results in a **discharge** to **waters of the U.S.**? (FORM 2B)		X	
C. Is this a facility which currently results in **discharges** to **waters of the U.S.** other than those described in A or B above? (FORM 2C)		X	
D. Is this a proposed facility *(other than those described in A or B above)* which will result in a **discharge** to **waters of the U.S.**? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of **hazardous wastes**? (FORM 3)	X		X
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed **stationary source** which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X	
J. Is this facility a proposed **stationary source** which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)			X

III. NAME OF FACILITY

1 SKIP HOPKINS AG CHEM & DBA COLE, ROBERTS, CROWN see above

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title) B. PHONE (area code & no.)

2 JONES, CHARLES ENVIRONMENTAL ENG 608 222 0624
HUBER DANIEL PLANT MANAGER 815 877 6976

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX

3 4995 N MAIN ST see above

B. CITY OR TOWN	C. STATE	D. ZIP CODE
4 ROCKFORD	IL	61103

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

5 NORTHROCK INDUSTRIAL PARK OR see above

B. COUNTY NAME

WINNEBAGO

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE (if known)
6 ROCKFORD	IL	61103	201

EPA Form 3510-1 (6-80)

NOV 18 1980

CONTINUE ON REVERSE

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST	B. SECOND
2879 (specify) FORMULATION OF AGRICULTURAL CHEMICALS	(specify)
C. THIRD	**D. FOURTH**
(specify)	(specify)

VIII. OPERATOR INFORMATION

A. NAME

HOPKINS AGRICULTURAL CHEMICAL COMPANY

B. Is the name listed in Item VIII-A also the owner? ☐ YES ☒ NO DH

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)

F = FEDERAL
S = STATE
P = PRIVATE
M = PUBLIC (other than federal or state)
O = OTHER (specify)

P (specify)

D. PHONE (area code & no.) 608 222 0624

E. STREET OR P.O. BOX

PO BOX 7532

F. CITY OR TOWN

MADISON

G. STATE WI

H. ZIP CODE 53707

IX. INDIAN LAND

Is the facility located on Indian lands? ☐ YES ☒ NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water): 9 N

D. PSD (Air Emissions from Proposed Sources): 9 P

B. UIC (Underground Injection of Fluids): 9 U

E. OTHER (specify): 9 Z IL 2010300 A X P (specify) DUST COLLECTOR

C. RCRA (Hazardous Wastes): 9 R

E. OTHER (specify): 9 (specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements. F9:A/50

XII. NATURE OF BUSINESS (provide a brief description)

FORMULATION AND PACKAGING OF DRY PESTICIDES, LIQUID PESTICIDES AND RELATED PRODUCTS F9:A/51

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
JAMES E. HOPKINS, PRESIDENT	James E Hopkins	11/17/80

COMMENTS FOR OFFICIAL USE ONLY

Continued from page 2.
NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

580

EPA I.D. NUMBER (enter from page 1): W ILDØ5782978Ø 3 1

FOR OFFICIAL USE ONLY: W DUP 3 2 DUP

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

DH

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)				D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	PØØ1	. 27,25ØØØØØ	P ~~G~~	SØ1	TØ4			
~~2~~ ØØ2	PØ44	. 22ØØØØØØ	P ~~G~~	SØ1	TØ4			
~~3~~ ØØ2	U239							INCLUDED WITH LINE 2
~~4~~ ØØ2	UØ57							INCLUDED WITH LINE 2
5	P122	. 66ØØØØØØ	P ~~G~~	SØ1	TØ4			
~~6~~	~~DØØØ~~	~~44ØØØØØØ~~	P ~~G~~	~~SØ1~~	~~TØ4~~			
~~7~~ ØØ7	~~DØØØ~~	~~22,ØØØØØØØ~~	P ~~G~~	~~SØ1~~	~~TØ4~~			
~~8~~ ØØ7	DØØ1							INCLUDED WITH LINE 7
9	UØØ2	. 55ØØ.ØØØ	P ~~G~~	SØ1	TØ4			
10	UØ41	. 11ØØ.ØØØ	P ~~G~~	SØ1	TØ4			
~~11~~ Ø11	~~DØØØ~~	~~11,ØØØØØØ~~	~~G~~	~~SØ1~~	~~TØ4~~			
~~12~~	DØØ1	·11Ø,ØØØ.ØØØ	P	SØ1	TØ4			INCLUDED WITH LINE 11
~~13~~ Ø11	UØ41							INCLUDED WITH LINE 11
14	UØ89	. 55Ø.ØØØ	P ~~G~~	SØ1	TØ4			
15	U154	. 55ØØ.ØØØ	P ~~G~~	SØ1	TØ4			
16	U188	. 11ØØ.ØØØ	P ~~G~~	SØ1	TØ4			
~~17~~ Ø17	~~DØØØ~~	~~825ØØØØ~~	~~G~~	~~SØ1~~	~~TØ4~~			
~~18~~ Ø17	FØØ3	. 825ØØ.ØØØ	P	SØ1	TØ4			INCLUDED WITH LINE 17
~~19~~ Ø17	DØ13							INCLUDED WITH LINE 17
20								
21								
22								
23								
24								
25								
26								

EPA Form 3510-3 (6-80)

CONTINUE ON REVERSE

(enter "A", "B", "C", etc. behind the "3" to identify photocopied pages)

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WASTE (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

NOT APPLICABLE

EPA I.D. NO. (enter from page 1)

F	I	L	D	0	5	7	8	2	9	7	8	0	3	6

V. FACILITY DRAWING

All **existing** facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail).* F6: A/55

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground–level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail).* F 6: B/56

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)			LONGITUDE (degrees, minutes, & seconds)		
42	19	55	089	04	27

VIII. FACILITY OWNER

☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. (area code & no.)
E HESS AND HOPKINS CENTER	815-877-2526

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
F 4995 N. MAIN STREET	G ROCKFORD	IL	61103

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
JAMES W. SHELDEN		11-17-80

X. OPERATOR CERTIFICATION

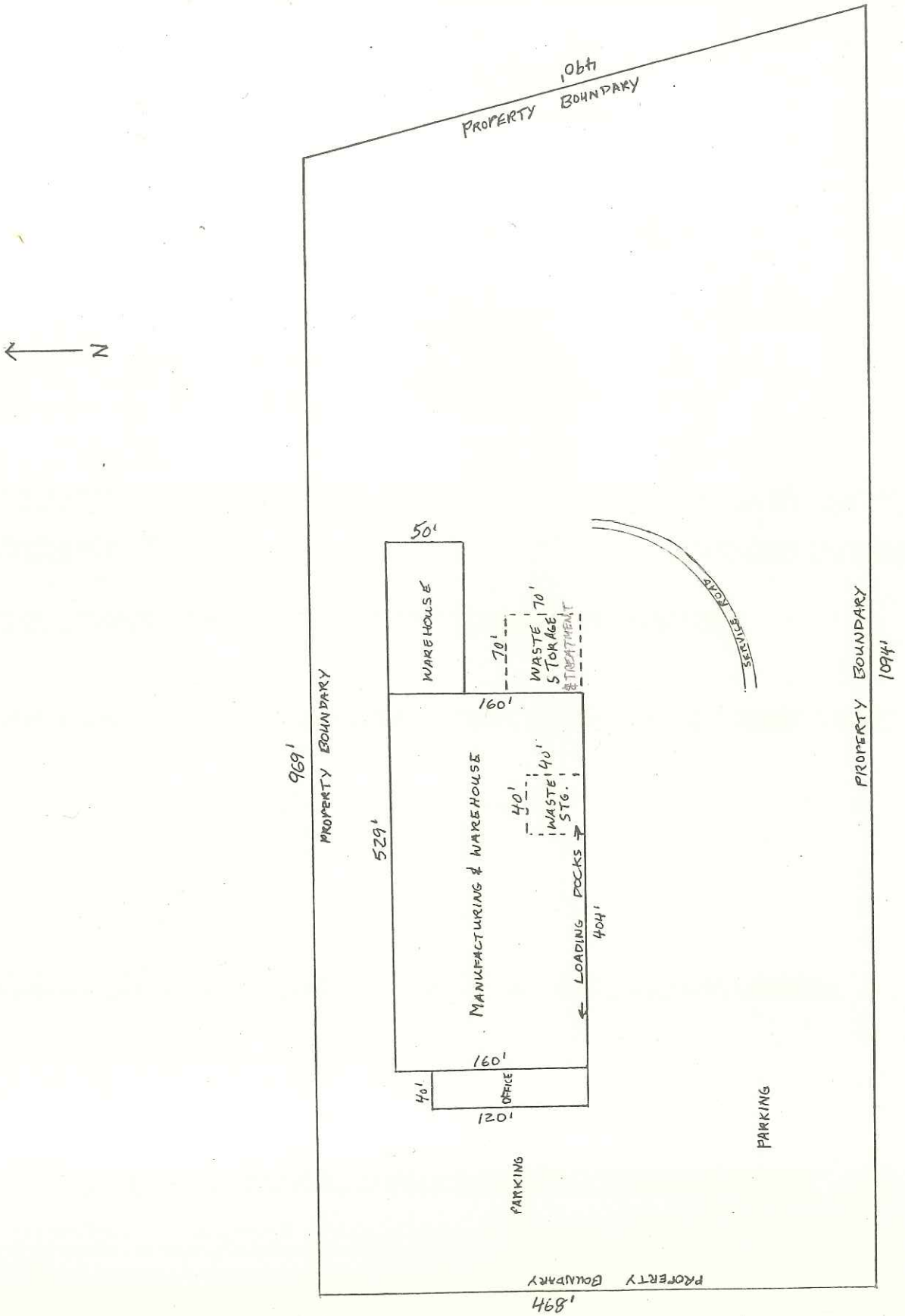
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
JAMES E. HOPKINS	James E Hopkins	11/17/80

Form Approved OMB No. 158-S80004

580

V. FACILITY DRAWING *(see page 4)*



SCALE: 1 INCH = 125 FEET

HOPKINS AGRICULTURAL CHEMICAL CO.
ROCKFORD, ILLINOIS

11/14/80

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11/14/80

Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

217/782-6762

Refer to: 2010300053 Winnebago County
Rockford/Hopkins Agricultural Chemical Company
Closure Plan Approved: October 25, 1983
ILD005829790

August 1, 1985

James E. Hopkins, President
Hopkins Agricultural Chemical Co.
537 Atlas Avenue
Madison, Wisconsin 53707

Dear Mr. Hopkins:

The subject hazardous waste management facility was inspected by Mrs. P.M. Luedtke a representative of this Agency on April 2, 1985. The inspection revealed that the closure activity was completed in accordance with the approved closure plan dated October 25, 1983, with the exception of tests for warfarin.

Certification that the Rockford/Hopkins Agricultural Chemical Co. Plant had been closed in accordance with the approved closure plan by the owner/operator, James E. Hopkins, President, on January 28, 1984 and an independent registered Illinois professional engineer, Michael W. Rapps, was received at this Agency on February 26, 1985. Results of analysis of a composite soil sample for warfarin was received July 8, 1985.

The Agency has determined that the closure of the Rockford/Hopkins Agricultural Chemical Co. Plant has met the requirements of Interim Status Standards, 35 Ill. Admin. Code, Part 725 (40 CFR, Part 265).

This facility is no longer subject to 35 Ill. Adm. Code Sec. 725.

In accordance with the requirements of 40 CFR 265.143(h), further maintenance of financial assurance mechanisms is no longer needed.

If you have any questions, please contact Robert C. Mulvey at 217/782-5504.

Very truly yours,

Lawrence W. Eastep

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:RCM:rml/1577E/1-2

cc: Rockford Region
USEPA Region V, Jodi Traub
Mike Rapps, P.E.
Division File
Financial Assurance Unit
Bill Radlinski
Jodie Traub

Hopkins
agricultural products div.
P.O. Box 7532/537 Atlas Avenue (608) 222-0624
Madison, WI 53707 TWX 910-286-2731

Registered Letter

September 12, 1983

CPJ-272

The Regional Administrator
RCRA Activities
EPA Region V
Box A-3587
Chicago, ILL 60690

FED ID-ILD057829780 PA,G, TRS, TSD

Dear Sir:

On June 22, 1983, Hopkins Agricultural Products Division indicated that the Rockford, Illinois Rodenticide Manufacturing Plant will be closed, cleaned and decontamination would be completed by September 15, 1983.

Hopkins Agricultural Products Division would like to extend the closure of the site to October 31, 1983.

A review of the site was conducted on September 6, 1983 by the IEPA. 90% of the equipment and cleaning of the site has been completed. Hopkins has scheduled steam cleaning of the ceiling, walls, and floors in the production areas. The underground storage tanks will be opened and each tank will be entered for cleaning to remove any trace of sediment or residue of the stored solvents.

All waste collected or generated as of September 5, 1983 has been removed and landfilled at IEPA approved disposal sites. M. Rapps Associates has been hired by Hopkins for verification of closure. M. Rapps Associates is an environmental engineering consulting firm located at 2387 West Monroe, Springfield, Illinois.

If any additional information is needed please contact my office.

HOPKINS AGRICULTURAL PRODUCTS DIVISION

Charles P. Jones
Charles P. Jones
Director of Environmental and Safety

cc: Tom Immel
IEPA RCRA Activities
M. Rapps Associates

CPJ/bjt

Hopkins
agricultural products div.
P.O. Box 7532/537 Atlas Avenue (608) 222-0624
Madison, WI 53707 TWX 910-286-2731

June 22, 1983 Registered CPJ-243

The Regional Administrator
RCRA Activities
EPA Region V
Box A-3587
Chicago, IL 60690

FED ID-ILD 057829780 DA, G, TRS, TSD, PAS

Dear Sir:

The Rodenticide manufacturing plant located at 4801 Shepherd Trail in Rockford, IL plans to reduce operations to a product distribution warehouse and product storage location. Process equipment will be cleaned and removed from the site. All waste materials will be collected and removed from the site by the completion of closure.

Enclosed is a copy of the closure plan. The plant equipment removal will be completed by July 31, 1983. General decontamination clean up and disposal will be completed by September 15, 1983.

HOPKINS AGRICULTURAL PRODUCTS DIVISION

Charles P. Jones
Director of Environmental & Safety

cc: Tom Immel
IEPA RCRA Activities

CPJ/bt

Hopkins

HOPKINS AGRICULTURAL CHEMICAL CO.
P.O. Box 7532, Madison, WI 53707
(608) 222-0624 • TWX 910 286 2731

9/15/82

Rockford, Illinois

RCRA

CLOSURE PLAN

Hopkins Agricultural Chemical Co., 4801 Shepherd Trail, Rockford Illinois, is a formulation plant for agricultural chemicals. The plant is organized in a four step system designed to formulate product. This system includes:

A. Storage Tanks

B. Process Equipment

C. Fill and Bag Rooms

D. Warehouse Loading Terminals

Hopkins Agricultural Chemical Co. has no plans to close in the forseeable future, however, if the plant was considered for sale or closure, the site would be cleaned and all waste generated would be removed. These wastes would be disposed using approved permits issued by IEPA, using disposal methods acceptable by State and Federal Regulations.

The following are the steps that will be used at the time of closure.

A. Storage Tanks

The technical raw material in the under ground storage tanks has been removed and the transfer lines disconnected. These tanks are not to be used for any operations in the plant. If future operations require their use, permit applications will be submitted along with modification of the closure plan.

B. Process Equipment

Bait Block process equipment will be flushed clean and opened. The solvents used for cleaning will be collected and disposed using permits that are used for disposal of waste during normal operations of the plant. These permits will remain active and will be renewed each year to assure proper handling of waste generated at any date of closure.

The process equipment that contains dry solids will be opened and cleaned. The powders or solids will be landfilled in 17H DOT approved drums at landfills permitted and approved by IEPA solid waste management section. These permits are active and will remain open for disposal during the operations of the site.

C. Fill and Bag Rooms

Each of the rooms containing process equipment or package equipment will be cleaned. The cleaning of these rooms will assure that dust or liquid hazardous waste present in the room will have been properly packaged for disposal.

D. Warehouse Loading Terminals and Drum Storage

All products produced or contained in the warehouse will be sold. Technical or stored waste will be removed prior to the final date of closing. The storage areas will be cleaned to assure no hazardous materials remain in the warehouse or drum storage area.

Closure Time

The closure will be completed within 90 days. Closure of a facility is estimated for 1/1/2010.

1. Part A is completed.
2. Part B will be completed in 45 days
3. Part C will be completed in 10 days
4. Part D will be completed in 35 days

Total 90 days

(Waste) Inventory

The maximum inventory of waste generated at the facility will be limited to economical accumulation of a given waste. When a full load of solid or liquid waste is generated, arrangements for disposal will be initiated. Permits will remain active allowing continuous disposal. The Rockford site is authorized to store hazardous waste and will be contained in the designated waste storage area.

1. Solid Waste contained in 17H drums — 40 cubic yards
2. Liquid Waste contained in 17C or 17E drums — 1200 gallons

Certification of Closure

When the Rockford site has been properly cleaned, the owner or operator will verify the site as inactive and decontaminated. In accordance with paragraph 265.114 under regulations governing RCRA a registered professional engineer will submit certification of completion to the Regional Administrator.

A. Storage Tanks - (Empty, not in use)

1. 4000 gal/kerosene + Tenneco 500/100
2. 4000 gal/kerosene + Tenneco 500/100
3. 3000 gal/Aromatic Naptha
4. 3000 gal/Tenneco 500/100
5. 4000 gal/Witco Oil
6. 4000 gal/Blend Mineral Seal/kerosene
7. 6000 gal/140 Flash-Petroleum Distillates
8. 6000 gal/Tenneco 500/100

B. Process Equipment

1. Bait Block Room		
a. 500 gallon wax tank	200	
b. Pipes and fill system	200	
		400

C. Mill Room

1. Ribbon Blender	200	
2. Bender & Mix Station	400	
3. Mill Hopper	400	
4. Pelletizer	400	
5. Particle Separator-Shaker	400	
6. Hopper 7 Bagging Station	200	
		1600

D. Triangle Room-Rodenticide Package

1. Packer A	100	
2. Packer B	100	
3. Packer C	100	
		300

E.	Warm Room		
	Blender & Package	400	
F.	Maintenance Shop		
	General Cleanup	200	
G.	Warehouse		
	1. Warehouse A	500	
	2. Warehouse B	500	
	3. Warehouse C	500	
			1500
H.	Dust Collectors		
	1. Dust Collector Roof	500	
	2. Dust Collector-North Side	500	
			1000
I.	Hazardous Drum Storage Area		200
J.	Cost of Registered Professional Engineer		1000
K.	Cost of Disposal for Recycle or Landfill		2000
	Total Cost of Closure		$8,000

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

April 21, 1993

Mr. Craig Anderson
Controller
ProVet Companies, Inc.
4801 Shepherd Trail
Rockford, Illinois 61103

Re: Visual Site Inspection
ProVet Companies, Inc.
(Formerly Hopkins Agricultural Chemical Company)
Rockford, Illinois
ILD 057 829 780

Dear Mr. Anderson:

The U.S. Environmental Protection Agency is enclosing a copy of the final Preliminary Assessment/Visual Site Inspection (PA/VSI) report for the referenced facility. The executive summary and conclusions and recommendations sections have been withheld as Enforcement Confidential.

If you have any questions, please call Francene Harris at (312) 886-2884.

Sincerely yours,

Kevin M. Pierard, Chief
Minnesota/Ohio Technical Enforcement Section
RCRA Enforcement Branch

U.S. Environmental Protection Agency
Office of Waste Programs Enforcement
Contract No. 68-W9-0006

TES 9

Technical Enforcement Support at Hazardous Waste Sites Zone III Regions 5,6, and 7

PRC

PRC Environmental Management, Inc.

PRC Environmental Management, Inc.
233 North Michigan Avenue
Suite 1621
Chicago, IL 60601
312-856-8700
Fax 312-938-0118

PRELIMINARY ASSESSMENT/ VISUAL SITE INSPECTION

PROVET COMPANIES, INC. (FORMERLY HOPKINS AGRICULTURAL CHEMICAL COMPANY) ROCKFORD, ILLINOIS ILD 057 829 780

FINAL REPORT

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460

Work Assignment No.	:	C05087
EPA Region	:	5
Site No.	:	ILD 057 829 780
Date Prepared	:	March 1, 1993
Contract No.	:	68-W9-0006
PRC No.	:	009-C05087IL8D
Prepared by	:	Dynamac Corporation (Dawn Thompson)
Telephone No.	:	(312) 466-0222
Contractor Project Manager	:	Shin Ahn
Telephone No.	:	(312) 856-8700
EPA Work Assignment Manager:	:	Kevin Pierard
Telephone No.	:	(312) 886-4448

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EXECUTIVE SUMMARY

Dynamac Corporation (Dynamac), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the ProVet Companies, Inc., (ProVet) facility (formerly the Hopkins Agricultural Chemical Company (Hopkins)), facility in Rockford, Winnebago County, Illinois. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from SWMUs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritizing RCRA facilities for corrective action.

From November 1986 to the present, ProVet has operated the facility as a warehouse and distribution center which supplies veterinary and domestic pet products to off-site customers. ProVet conducts no on-site treatment or disposal activities and there are no manufacturing or processing activities at the facility. ProVet generates no solid waste, other than municipal trash, at the facility.

From the mid-1970s until 1983, Hopkins formulated and packaged rodenticide at the facility. Hopkin's operations at the facility included blending, mixing, pelletizing, shaking, and packaging of rodenticide. In addition, Hopkins operated a quality control (QC) laboratory. The QC laboratory conducted physical experiments such as measuring the length and size of pellets, and the amount of dust generated from the pellets.

In 1983, Hopkins ceased operations at this facility and relocated them to its Randolph, Wisconsin, facility. In 1984, Hopkins conducted RCRA closure activities at the facility and operated it as a product distribution warehouse until 1986.

The facility includes one 1.6-acre building and approximately 9.5 acres of outdoor paved and gravel areas. ProVet currently divides the building into warehousing and office areas and employs approximately 75 people; about 25 work in the warehousing area and the remainder work in offices.

The facility has been owned by Mr. James Shelden since the mid-1970s. Mr. Shelden leased the facility to Hopkins and currently leases the facility to ProVet.

The hazardous waste streams formerly generated at the facility by Hopkins were rodenticide waste (P001), mixed rodenticide waste (P001, D013), and spent solvent wash (D001, U002, U154, U239). Hopkins also generated hazardous washwater (P001) and nonhazardous rodenticide waste on a one-time basis during RCRA closure activities. Dynamac notes that waste codes are those assigned by Hopkins and may be incomplete or inaccurate. No information was available in Hopkins, EPA, or IEPA files pertaining to any routine nonhazardous wastes which may have been generated at the facility by Hopkins. No solid waste, other than municipal trash, is generated at the facility by ProVet.

The RCRA Part A permit application (Part A) listed the following process codes and capacities: S01 (44,000 gallons) and T04 (5,500 gallons per day). The S01 code incorrectly referred to a 1,600-square-foot indoor container storage area and a 4,900-square-foot outdoor container storage area; the T04 code was apparently a protective filing. According to a 1983 Illinois Environmental Protection Agency (IEPA) RCRA inspection report, Hopkins never used the indoor container storage area identified on the Part A to manage waste. In 1983, IEPA also noted that Hopkins incorrectly identified the location of the Former Waste Storage Area (SWMU 1) on the Part A. SWMU 1 is actually located immediately adjacent to the Part A location of the outdoor 4,900-square-foot container storage area. According to available IEPA file information there is no documentation that the facility ever used the 4,900-square-foot container storage area to store solid waste.

In February 1985, Hopkins notified IEPA that the facility had ceased operations, that RCRA closure activities had been completed and certified by a registered professional engineer, and that all process equipment had been cleaned and removed from the facility. In April 1985, IEPA conducted a RCRA closure inspection and collected four soil samples. The four soil samples were composited and analyzed for warfarin. Analysis results indicated less than 0.2 parts per million (ppm) of warfarin to be present. In August 1985, IEPA approved RCRA closure activities for the Former Waste Storage Area (SWMU 1) at the facility. The facility currently does not generate any hazardous waste.

The PA/VSI identified the following three SWMUs at the facility:

1. Former Waste Storage Area
2. Former Dust Collector
3. Former Floor Sweepings Accumulation Areas

The PA/ VSI identified two AOCs at the facility:

1. Raw Material Underground Storage Tank (UST) Area
2. Gasoline UST Area

The potential for a release to on-site soils, ground water, surface water, or air from SWMUs 1, 2, and 3 is low. SWMU 1 managed hazardous and nonhazardous wastes in full 55-gallon drums, floor sweepings bags, and dust collector bags outdoors on an asphalt pad. SWMU 1 is partially surrounded by a 3.5-foot high concrete berm and an 8-foot high chain-link fence with a locked gate. In August 1985, IEPA approved RCRA closure activities for SWMU 1. SWMU 1 has not been used to manage waste since 1984. There are no drains in the vicinity of SWMU 1. SWMU 2 managed hazardous wastes in dust collector bags outdoors on the tar and gravel roof of the building. SWMU 2 was removed in 1984. SWMU 3 managed hazardous wastes in 55-gallon drums and floor sweepings bags in designated areas indoors on a concrete floor with no floor drains. SWMU 3 ceased operations in 1984.

The likelihood of a historical release to on-site soils and ground water from AOCs 1 and 2 is moderate. AOC 1 includes eight steel USTs ranging in size from 3,000 to 6,000 gallons, which are currently empty but remain in place. From the mid-1970s until 1982, the USTs contained kerosene, naphtha, mineral spirits, petroleum distillates, and trade name oils. There was no additional information in Hopkins, EPA, or IEPA files available at the time of the PA/VSI regarding any secondary containment features, leak testing, or any soil sampling associated with these USTs. AOC 2 formerly included an undocumented number of gasoline USTs. According to ProVet representatives, the gasoline USTs were removed during the mid-1980s. There was no additional information at the time of the PA/VSI describing the number, construction materials, when the USTs were installed, any secondary containment features, or removal of the USTs at AOC 2. The soil in the vicinity of the facility consists of sand and gravel. The depth to ground water is not documented, but likely to be 10 to 15 feet below ground surface (bgs), corresponding to the level of the Rock River.

The likelihood of a historical release to surface water and air from AOCs 1 and 2 is low. The nearest surface water body, the Rock River, is located about 0.5 mile southeast of the facility. The USTs are located below the ground surface and are not likely to volatilize to the atmosphere.

The nearest school, Boylan Central High School, is located approximately 0.75 miles southwest of the facility. There are 15 other schools located within 2 miles of the facility. The nearest residences are located about 1,000 feet west of the facility, immediately across Main Street. The paved and gravel outdoor areas at the facility are not fenced; however, no products are stored outdoors. Prior to 1984, Hopkins stored hazardous and nonhazardous wastes outdoors in SWMU 1 which is surrounded by an 8-foot high chain-link fence. Building access is controlled by locked doors and an alarm system during non-business hours.

The nearest surface water body is the Rock River located about 0.5 mile southeast of the facility. Surface water runoff at the facility is collected by an unnamed drainage ditch which flows southeast and discharges to the Rock River. The Rock River is used for fishing, canoeing, and industrial purposes, including treated waste water discharges and untreated storm water discharges. The Rock River ultimately discharges to the Mississippi River near Rock Island, Illinois.

The municipal water supply for the City of Rockford is exclusively derived from 37 drift and bedrock wells. Two of these wells are located in the vicinity of the ProVet facility. The nearest municipal well is located 0.75 mile east of the facility near the Rock River. This well is screened from 44 to 97 feet bgs in the surficial drift aquifer. The second well is located 1 mile south of the facility. The second well is an open borehole from 207 feet to 1,127 feet bgs in the St. Peter Sandstone, and several lower sandstone and limestone aquifers. Private wells located outside the Rockford city limits draw from the upper bedrock aquifers. There was no information available at the time of the PA/VSI regarding industrial wells in the city of Rockford.

Sensitive environments are not located at the facility. The nearest sensitive environment is a 5-acre intermittently exposed marshy area with an unconsolidated bottom located about 2,000 feet southeast of the facility. Other sensitive environments within 2 miles of the facility include a seasonally-flooded forested marshy area and a semipermanently-flooded excavated marshy area with an unconsolidated bottom, both approximately 5 acres in size and located about 0.5 mile northwest and north of the facility, respectively. In addition, there are two seasonally-flooded marshy areas with emergent vegetation and one temporarily-flooded forested marshy area, all approximately 2 acres in size and located about 0.7 mile northeast and north of the facility, respectively.

Dynamac recommends no further action for SWMUs 1, 2, and 3 at this time.

Dynamac recommends that the facility conduct soil sampling for total petroleum hydrocarbons in the vicinity of AOC 1 to determine if past releases have occurred.

Dynamac recommends that the facility conduct soil sampling for benzene, toluene, ethyl benzene, and xylene in the vicinity of AOC 2 to determine if past releases have occurred.

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5. PRC assigned Dynamac Corporation (Dynamac), its TES 9 subcontractor, to conduct the PA/VSI for the ProVet Companies, Inc., (ProVet) facility (formerly the Hopkins Agricultural Chemical Company (Hopkins) facility) (EPA Identification No. ILD 057 829 780), in Rockford, Illinois.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells

- Closed and abandoned units

- Recycling units, wastewater treatment units, and other units that EPA has usually exempted from standards applicable to hazardous waste management units

- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading or unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release of hazardous waste or constituents to the environment has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where a strong possibility exists that such a release might occur in the future.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI.

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases.

The VSI includes interviewing appropriate facility staff; inspecting the entire facility to identify SWMUs and AOCs; photographing all visible SWMUs; identifying evidence of releases; making a preliminary selection of potential sampling parameters and locations, if needed; and obtaining additional information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the ProVet facility (EPA Identification No. ILD 057 829 780) in Rockford, Winnebago County, Illinois. The PA was completed on December 9, 1992. Dynamac gathered and reviewed information from the Illinois Environmental Protection Agency (IEPA) offices in Springfield, Illinois, and from EPA Region 5 RCRA files. In addition, Dynamac gathered information from the Federal Emergency Management Agency (FEMA), the National Oceanic and Atmospheric Administration (NOAA), the U.S. Department of the Interior (USDI), the U.S. Geological Survey (USGS), and the Illinois Geological Survey Division (IGSD).

Dawn Thompson and Russ Crittenden of Dynamac conducted the VSI on December 10, 1992. The VSI included interviews with ProVet representatives and a walk-through inspection of the facility. Dynamac identified three SWMUs and two AOCs at the facility. In addition, on December 15, 1992, Dynamac conducted a telephone interview with Mr. Lee Schwalenberg, Plant Manager for the Hopkins facility in Randolph, Wisconsin, regarding Hopkins operations at the former Hopkins facility in Rockford, Illinois.

Dynamac completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included in Attachment A. The VSI is summarized and three inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C.

2.0 FACILITY DESCRIPTION

This section describes the facility's location; past and present operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors.

2.1 FACILITY LOCATION

The ProVet facility is located at 4801 Shepherd Trail, in Rockford, Winnebago County, Illinois. Figure 1 shows the location of the facility in relation to the surrounding topographic features (latitude 42° 19' 25" N and longitude 89° 04' 25" W) (USGS, 1971). The facility occupies approximately 11 acres in a predominantly industrial which includes some residences. The facility is located on the north side of Rockford.

The facility is bordered on the north by an industrial area; on the east by a wooded area, across from which are Chicago, Milwaukee, St. Paul, and Pacific railroad tracks; on the west by Shepherd Trail, across from which is an industrial area; and on the south by an undeveloped grassy area, across from which is an industrial area.

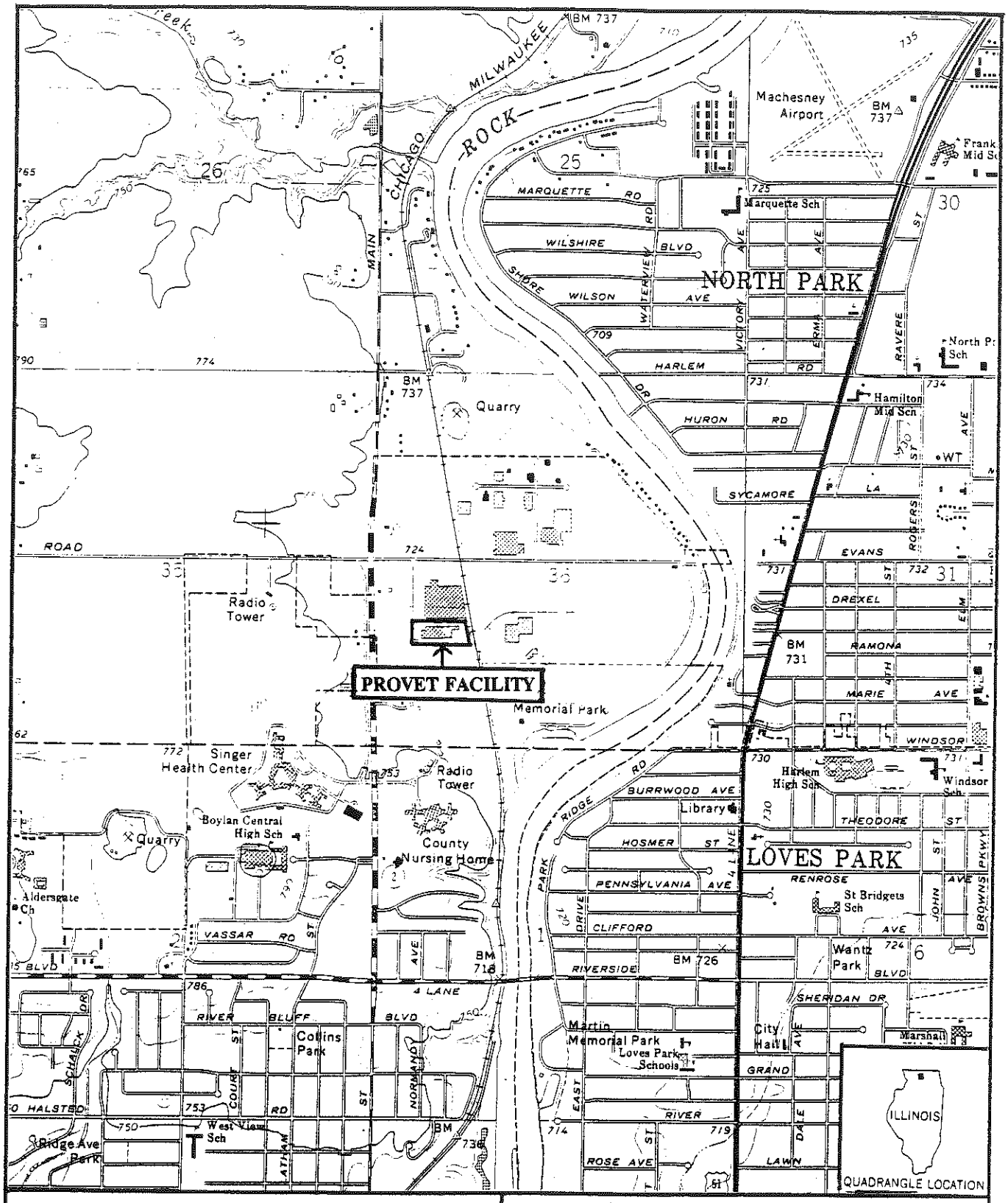
2.2 FACILITY OPERATIONS

The facility has been owned by Mr. James Shelden since the mid-1970s. Mr. Shelden leased the facility to Hopkins, and currently leases the facility to ProVet.

From November 1986 to the present, ProVet has operated the facility as a warehouse and distribution center which supplies veterinary and domestic pet products to off-site customers. ProVet conducts no on-site treatment or disposal activities and there are no manufacturing or processing activities at the facility. ProVet generates no solid waste, other than municipal trash, at the facility. The facility has one building which is divided into a warehousing area and offices. Damaged, expired, or outdated products are occasionally generated, but not managed as waste; they are returned to the vendors. The original vendors are thus the generators of any wastes resulting from damaged, expired, or outdated products.

From the mid-1970s until 1983, Hopkins formulated and packaged rodenticide at the facility. Hopkin's operations at the facility included blending, mixing, pelletizing, shaking, and packaging of rodenticide. In addition, Hopkins operated a quality control (QC) laboratory. The QC laboratory conducted physical experiments such as measuring the length and size of pellets and the amount of dust generated from the pellets (Dynamac, 1992).

From the mid-1970s until 1982, Hopkins maintained eight steel underground storage tanks (USTs) ranging in size from 3,000 to 6,000 gallons at the Raw Material UST Area (AOC 1). The USTs contained kerosene, naphtha, mineral spirits, petroleum distillates, and trade name oils. In addition, Hopkins formerly maintained an undocumented number of



SCALE 1:24,000

0 ½ 1 MILE

0 1000 2000 3000 4000 FEET

SCALE 1" = 2,000'

North

Source: Modified From USGS, 1971

FIGURE 1
FACILITY LOCATION

PROVET FACILITY
ROCKFORD, ILLINOIS

gasoline USTs at the Gasoline UST Area (AOC 2) until the mid-1980s. There was no additional information in Hopkins, EPA, or IEPA files available at the time of the PA/VSI regarding other raw materials used or where they were stored.

In 1983, Hopkins ceased operations at this facility and relocated to the Randolph, Wisconsin, facility. In 1984, Hopkins conducted RCRA closure activities at this facility and operated it as a product distribution warehouse until 1986.

The facility includes one 1.6-acre building and approximately 9.5 acres of outdoor paved and gravel areas. ProVet currently divides the building into warehousing and office areas and employs approximately 75 people; about 25 work in the warehousing area and the remainder work in offices.

Solid waste generated by Hopkins facility operations and the SWMUs where they were managed are discussed in detail in Section 2.3.

There was no information available during the VSI interview or in Hopkins, EPA, or IEPA files available at the time of the PA/VSI regarding the use of the facility prior to the mid-1970s. Dynamac was unable to reach Mr. Shelden regarding the use of the facility prior to the mid-1970s, as his telephone number is unlisted.

2.3 WASTE GENERATION AND MANAGEMENT

Prior to 1984, wastes were generated and managed at several locations at the facility. SWMUs and their current status are identified in Table 1. The locations of SWMUs and AOCs in relation to the facility layout are shown in Figure 2. Wastes formerly generated at the facility are summarized in Table 2. Facility generation and management of both hazardous and nonhazardous wastes is discussed below.

Currently no solid waste, other than municipal trash, is generated at the facility by ProVet. The hazardous waste streams formerly generated at the facility by Hopkins were rodenticide waste (P001), mixed rodenticide waste (P001, D013), and spent solvent wash (D001, U002, U154, U239). Hopkins also generated hazardous washwater (P001) and nonhazardous rodenticide waste on a one-time basis during RCRA closure activities. Dynamac notes that waste codes listed are those assigned by Hopkins and may be incomplete or inaccurate. No information was available in Hopkins, EPA, or IEPA files pertaining to any routine nonhazardous wastes which may have been generated at the facility by Hopkins.

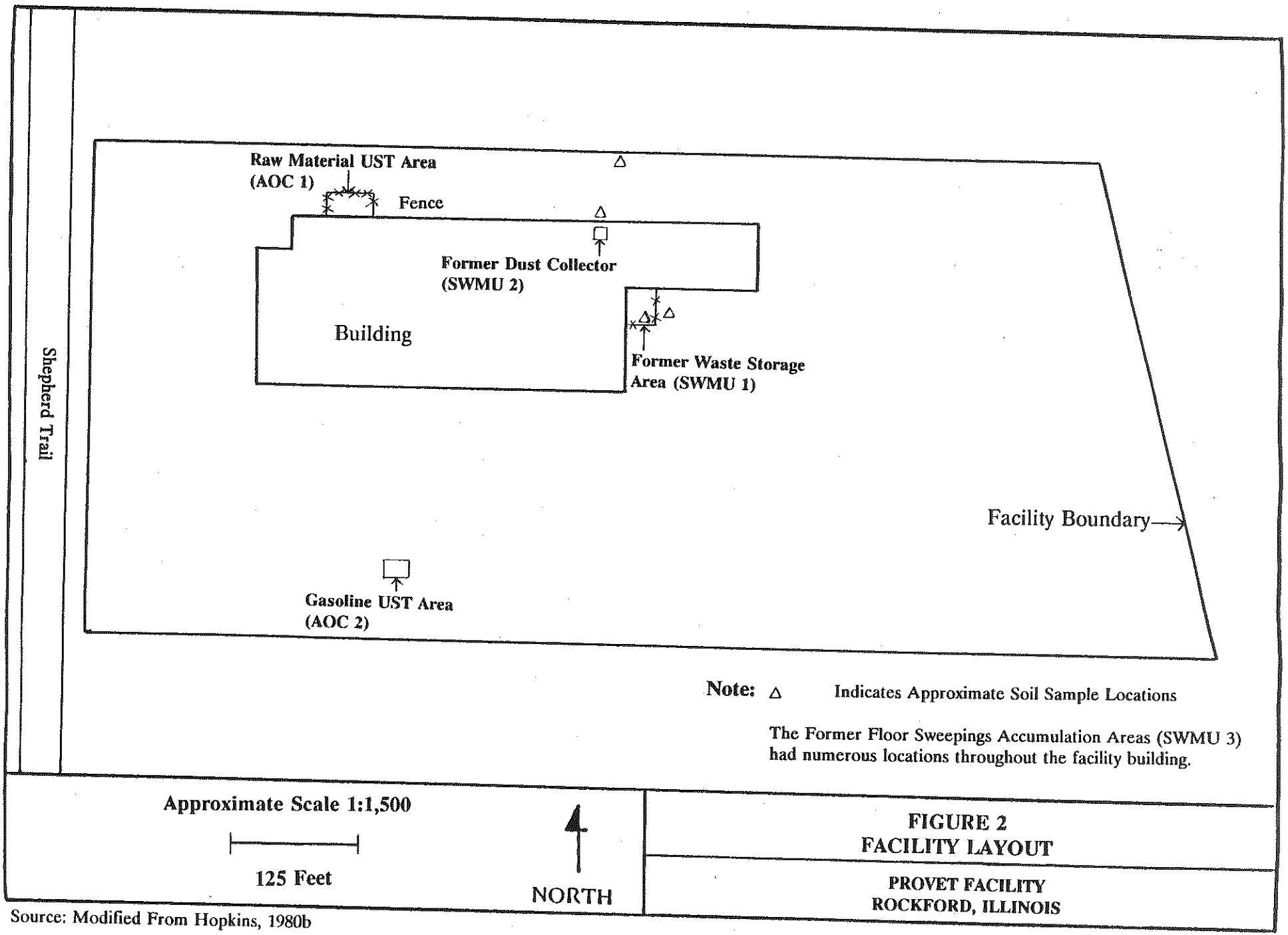
From the mid-1970s until 1983, Hopkins generated rodenticide waste (P001) during the formulating and packaging of the rodenticide warfarin. Hopkins generated this waste from floor sweepings and the air cleaning system. Hopkins collected the rodenticide waste from floor sweepings in 55-gallon drums and floor sweepings bags in the Former Floor Sweepings Accumulation Areas (SWMU 3) prior to transferring the full containers to the

TABLE 1
SOLID WASTE MANAGEMENT UNITS

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit*	Status
1	Former Waste Storage Area	Yes	Inactive; IEPA approved RCRA closure in 1985
2	Former Dust Collector	No	Inactive since removal in 1984
3	Former Floor Sweepings Accumulation Areas	No	Inactive since 1984 when the facility converted to a warehouse

Note:

* A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.



Source: Modified From Hopkins, 1980b

TABLE 2
SOLID WASTES

Waste/EPA Waste Code	Source	Solid Waste Management Unit
Rodenticide Waste/ (P001) [a]	Rodenticide formulating and packaging	1, 2, and 3
Mixed Rodenticide Waste/(P001, D013) [a]	Rodenticide formulating and packaging	1, 2, and 3
Spent Solvent Wash/(D001, U002, U154, U239) [a]	Drum cleaning activities	1
Washwater/(P001) [b]	RCRA closure activities	1
Nonhazardous Rodenticide Waste/ NA [b,c]	RCRA closure activities	1

Notes:

[a] This waste has not been generated or managed at the facility since 1983.

[b] This waste has not been generated or managed at the facility since 1984.

[c] Not applicable (NA) designates nonhazardous waste.

Former Waste Storage Area (SWMU 1). Hopkins collected the rodenticide waste from the facility air cleaning system in dust collector bags in the Former Dust Collector (SWMU 2). Hopkins transferred the full dust collector bags from SWMU 2 to the Former Waste Storage Area (SWMU 1). In 1983, the most recent year that this facility generated this waste, Hopkins generated 16,160 gallons of rodenticide waste. Browning Ferris Industries (BFI) of Winthrop Harbor, Illinois, transported this waste off site (Hopkins, 1984). There was no additional information in Hopkins, EPA or IEPA files available at the time of the PA/VSI regarding the name of the treatment, storage, or disposal (TSD) facility for this waste or the final disposition of this waste.

From the mid-1970s until 1983, Hopkins generated mixed rodenticide waste (P001, D013) during the formulating and packaging of the rodenticides warfarin and lindane. Hopkins generated this waste from floor sweepings and the air cleaning system. Hopkins collected the mixed rodenticide waste from floor sweepings in both 55-gallon drums and floor sweepings bags in the Former Floor Sweepings Accumulation Areas (SWMU 3) prior to transferring the full containers to the Former Waste Storage Area (SWMU 1). Hopkins collected the mixed rodenticide waste from the facility air cleaning system in dust collector bags in the Former Dust Collector (SWMU 2). Hopkins transferred the full dust collector bags from SWMU 2 to the Former Waste Storage Area (SWMU 1). In 1983, the most recent year that this facility generated this waste, Hopkins generated 4,040 gallons of mixed rodenticide waste. BFI in Winthrop Harbor, Illinois, transported this waste off site (Hopkins, 1984). There was no additional information in Hopkins, EPA or IEPA files available at the time of the PA/VSI regarding the name of the TSD facility for this waste or the final disposition of this waste.

From the mid-1970s until 1983, Hopkins generated spent solvent wash (D001, U002, U154, U239) from drum cleaning activities. Hopkins collected this waste in 55-gallon drums. Hopkins generated 2,950 gallons of this waste in 1983. Environmental Waste Resources, Inc., of Coal City, Illinois, transported this waste off site (Hopkins, 1984). There was no additional information in Hopkins, EPA, or IEPA files available at the time of the PA/VSI regarding how or where this waste was generated and managed on site, the TSD for this waste, or the final disposition of this waste.

In 1984, Hopkins generated washwater (P001) on a one-time basis during RCRA closure activities. Hopkins ceased operations, conducted RCRA closure activities, and cleaned and removed all process equipment. Hopkins collected washwater from this activity in 55-gallon drums and transferred them to the Former Waste Storage Area (SWMU 1). In 1984, Hopkins generated 3,850 gallons of this waste. Oil Services Company, Inc., of Columbia, Tennessee, transported this waste to Liquid Waste Disposal in Calvert City, Kentucky (Hopkins, 1985b). There was no additional information in Hopkins, EPA, or IEPA files available at the time of the PA/VSI regarding the final disposition of this waste.

In 1984, Hopkins generated nonhazardous rodenticide waste on a one-time basis during RCRA closure activities. Hopkins collected the nonhazardous rodenticide waste in

55-gallon drums and transferred the full drums to the Former Waste Storage Area (SWMU 1). In 1984, Hopkins generated 367 drums of this waste. BFI of Winthrop Harbor, Illinois, transported this waste to its facility in Winthrop Harbor, Illinois for landfilling (Hopkins, 1985b). There was no information in Hopkins, EPA, or IEPA files regarding how this waste differed from the hazardous rodenticide wastes.

2.4 HISTORY OF DOCUMENTED RELEASES

There have been no documented releases to on-site soils, ground water, surface water, or air at the facility.

2.5 REGULATORY HISTORY

Hopkins submitted a Notification of Hazardous Waste Activity to EPA on August 15, 1980 (Hopkins, 1980a). Hopkins submitted a RCRA Part A permit application (Part A) to EPA on November 17, 1980. The Part A listed the following process codes and capacities: S01 (44,000 gallons) and T04 (5,500 gallons per day). The Part A listed D001, D013, P001, P044, P122, U002, U041, U057, U089, U154, U188, and U239 waste codes (Hopkins, 1980b).

The S01 code incorrectly referred to a 1,600-square-foot indoor container storage area and a 4,900-square-foot outdoor container storage area; the T04 code was apparently a protective filing. According to a 1983 IEPA RCRA inspection report, Hopkins never used the indoor container storage area to manage waste (IEPA, 1983a). In 1983, IEPA also noted that Hopkins incorrectly identified the location of the Former Waste Storage Area (SWMU 1) on the Part A. SWMU 1 is actually located immediately adjacent to the Part A location of the outdoor 4,900-square-foot container storage area. According to available IEPA file information there is no documentation that the facility ever used the 4,900-square-foot container storage area to store solid waste (IEPA, 1983a; IEPA, 1983b).

In 1982, Hopkins notified EPA that the T04 code referred to 55-gallon drum cleaning activities and should not have been identified as a hazardous waste treatment process (Hopkins, 1982a). There was no information in Hopkins, EPA, or IEPA files available at the time of the PA/VSI regarding whether EPA concurred with this.

In October 1983, IEPA approved Hopkins' closure plan (IEPA, 1983c). In February 1985, Hopkins notified IEPA that the facility had ceased operations, that RCRA closure activities had been completed and certified by a registered professional engineer, and that all process equipment had been cleaned and removed from the facility (Rapps, 1985).

In September 1983, IEPA conducted an inspection at the facility to determine if RCRA closure was proceeding according to the closure plan (IEPA, 1983a). There was no information available at the time of the PA/VSI in Hopkins, EPA, or IEPA files regarding any violations resulting from the inspection. In October 1983, IEPA conducted a RCRA inspection and collected three soil samples (IEPA, 1983b). Figure 2 shows the locations of the three soil samples. The three soil samples were not analyzed because no methods had

been standardized for analyzing the rodenticides of interest (IEPA, 1985b). There was no information in Hopkins, EPA, or IEPA files available at the time of the PA/VSI indicating what prompted IEPA to collect soil samples, what the rodenticides of interest were, or any violations resulting from this inspection.

In April 1984, IEPA sent a compliance inquiry letter to Hopkins requesting that the facility submit its 1983 Annual Hazardous Waste Report (IEPA, 1984). On January 7, 1985, IEPA notified Hopkins that after reviewing information submitted by the facility as part of financial requirements reporting the following deficiencies were noted; failure to maintain liability coverage, failure to provide a closure plan, failure to submit a closure cost estimate, and failure to provide financial assurance (IEPA, 1985a). On January 17, 1985, Hopkins responded to the January 7, 1985, deficiencies in a letter explaining that the facility had ceased operations in 1983 and that certification of RCRA closure activities was being pursued (Hopkins, 1985a). In April 1985, IEPA conducted a RCRA closure inspection and collected four soil samples, three from the same areas sampled in October 1983, and one soil sample from an area immediately east of the Former Waste Storage Area (SWMU 1) (See Figure 2) (IEPA, 1985b). The four soil samples were composited and analyzed for warfarin. Analysis results indicated less than 0.2 parts per million (ppm) of warfarin to be present (Hopkins, 1985c). In August 1985, IEPA approved RCRA closure activities for the facility (IEPA, 1985c).

In 1982, IEPA inspected the facility in response to an allegation of buried waste at the facility. IEPA determined that the waste burial occurred at a Hopkins facility in Wisconsin, and not at the Hopkins facility in Rockford, Illinois (IEPA, 1982).

ProVet has been operating at the facility since 1986 and does not generate any solid waste other than municipal trash.

Hopkins was not required to have air operating permits. The facility has no history of odor complaints from area residents.

The facility discharges surface water runoff to a surface water body. The facility's surface water runoff is collected by an unnamed drainage ditch which flows southeast to the Rock River. The facility is not required to have a National Pollutant Discharge Elimination System (NPDES) permit for this discharge.

Hopkins maintained eight steel USTs ranging in size from 3,000 to 6,000 gallons, located outdoors along the north side of the building (Raw Material UST Area - AOC 1). From the mid-1970s until 1982, the USTs contained raw materials including kerosene, naphtha, mineral spirits, petroleum distillates, and trade name oils. The USTs are no longer used but remain in place. In addition, Hopkins maintained an undocumented number of gasoline USTs outdoors along the center of the south side of the facility (Gasoline UST Area - AOC 2). Hopkins used the gasoline to fuel facility equipment. According to ProVet representatives, the gasoline USTs were removed during the mid-1980s; however, no

documentation of removal activities was available at the time of the PA/VSI. There was no additional information available during the PA/VSI in Hopkins, EPA, or IEPA files regarding the number, construction materials, installation date, or any leak testing or subsequent soil sampling activities associated with any of the USTs.

There is no documentation of any CERCLA (Superfund) activity at the facility.

2.6 ENVIRONMENTAL SETTING

This section describes the climate; flood plain and surface water; geology and soils; and ground water in the vicinity of the ProVet facility.

2.6.1 Climate

The climate in the Rockford area is continental with cold winters and warm summers. The average annual daily temperature is 48.5° F. The highest average daily temperature is 73.8° F in July, and the lowest average daily temperature is 20.6° F in January (NOAA, 1990).

Mean annual precipitation is 35.44 inches (NOAA, 1990). Mean annual lake evaporation is approximately 31 inches and net annual precipitation is approximately 4 inches. The 1-year 24-hour maximum rainfall is approximately 2.5 inches (NOAA, 1979).

The prevailing wind is from the south-southwest. Average wind speed is highest in April at an average of 11.8 miles per hour from the west-northwest (NOAA, 1990).

2.6.2 Flood Plain and Surface Water

The facility is located in an area outside the 100-year flood plain, but partially within the 500-year flood plain of the Rock River (FEMA, 1982). The nearest surface water body is the Rock River located about 0.5 mile southeast of the facility. Surface water runoff at the facility is collected by an unnamed drainage ditch which discharges about 0.5 mile southeast of the facility into the Rock River. The Rock River is used for fishing, canoeing, and industrial purposes, including treated waste water discharges and untreated storm water discharges (Dynamac, 1993b). The Rock River flows south and west and discharges to the Mississippi River near Rock Island, Illinois (State of Illinois, 1991).

2.6.3 Geology and Soils

The soils of the facility are mapped as Plano silt loam and Wea silt loam. The Plano silt loam is a deep, well drained, moderately permeable soil developed in loess overlying stratified outwash and alluvial deposits on terraces. The Wea silt loam is a deep, well drained soil, which is moderately permeable in the upper portion and very rapidly permeable in the subsoil. Wea silt loam is developed in loess overlying stratified outwash on stream terraces (SCS, 1980).

The surficial geological deposits in the area around the facility are mapped as Cahokia Alluvuim and the Mackinaw Member of the Henry Formation. The Cahokia Alluvium consists of post-glacial flood deposits along streams. The Mackinaw Member of the Henry Formation consists of thick stratified sand and gravel outwash deposits laid down along glacial drainageways during the last Wisconsin-age glaciation of the area (Lineback, 1979). The total thickness of the unconsolidated surficial deposits varies sharply from approximately 15 feet in upland areas west of the facility to more than 200 feet in the Rock River Valley east of the facility (IGSD, 1981).

The uppermost bedrock in the vicinity of the ProVet facility is mapped as the Ordovician Galena and Platteville Groups. These groups consist of a number of dolomite and limestone formations totalling approximately 330 feet in thickness west of the facility. These rocks are much thinner near the edge of the bedrock Rock River Valley. The Galena and Platteville Groups are underlain by the Ordovician Ancell Group, which consists of the Glenwood Formation and St. Peter Sandstone. The basal Ordovician-age rocks belong to the Prairie du Chien Group, which consists of four alternating sandstone and dolomite formations (Hackett and Bergstrom, 1956).

The Ordovician-age rocks are underlain by the Cambrian Trempealaeu (or Potosi) Dolomite and Franconia Formation. The Franconia Formation is principally composed of argillaceous sandstone and dolomite. The Ironton and Galesville Sandstones underlie the Franconia Formation. The basal Cambrian-age rocks consists of approximately 2,000 feet of sandstones belonging to the Eau Claire and Mt. Simon Formations (Hackett and Bergstrom, 1956). The Mt. Simon Formation occurs at a depth of approximately 1,100 feet below ground surface (bgs) (IGSD, 1981).

2.6.4 Ground Water

There are several bedrock aquifers and one surficial drift aquifer in the Rockford area. The surficial drift aquifer consists of sand and gravel deposits of outwash near the Rock River. There are no monitoring wells at the facility but the depth to ground water and the direction of flow can be estimated from the area topography and surface water. Ground water probably flows east to southeast towards the Rock River, and the depth to ground water is probably 10 to 15 feet bgs, corresponding to the level of the Rock River (USGS, 1971). There is no documentation of hydraulic conductivity in available file information.

In the bedrock, all the dolomites and sandstones are creviced and permeable to some extent, but the principal aquifers are the St. Peter Sandstone, and the Ironton and Galesville Sandstones. The Mt. Simon Formation is the most productive aquifer with water of acceptable quality (IGSD, 1981). The direction of ground water flow in these formations is generally to the east (Hughes, Kraatz, and Landon, 1966).

The municipal water supply for the City of Rockford is exclusively derived from 37 drift and bedrock wells. Two of these wells are located in the vicinity of the ProVet facility. The nearest municipal well is located 0.75 mile east of the facility near the Rock River. This well is screened from 44 to 97 feet bgs in the surficial drift aquifer. The second well is located 1 mile south of the facility. The second well is an open borehole from 207 feet to 1,127 feet bgs in the St. Peter Sandstone, and several lower sandstone and limestone aquifers (Dynamac, 1993a). Private wells located outside the Rockford city limits draw from the upper bedrock aquifers (IGSD, 1981). There was no information available at the time of the PA/VSI regarding industrial wells in the city of Rockford.

2.7 RECEPTORS

The facility occupies approximately 11 acres in a predominantly industrial area which includes some residences in Rockford, Illinois. Rockford had a 1990 population of 141,638 (State of Illinois, 1991).

The facility is bordered on the north by an industrial area; on the east by a wooded area, across from which are Chicago, Milwaukee, St. Paul, and Pacific railroad tracks; on the west by Shepherd Trail, across from which is an industrial area; and on the south by an undeveloped grassy area, across from which is an industrial area.

The nearest school, Boylan Central High School, is located approximately 0.75 mile southwest of the facility (USGS, 1971). There are 15 other schools located within 2 miles of the facility. The nearest residences are located approximately 1,000 feet west of the facility, immediately across Main Street. The paved and gravel outdoor areas at the facility are not fenced; however, no products are stored outdoors. Prior to 1984, Hopkins stored hazardous and nonhazardous wastes outdoors in SWMU 1. SWMU 1 and AOC 1 are surrounded by chain-link fences. Building access is controlled by locked doors and an alarm system during non-business hours.

The nearest surface water body is an unnamed drainage ditch located along the south boundary of the facility. The drainage ditch discharges to the Rock River approximately 0.5 mile southeast of the facility (USGS, 1971). The Rock River is used for fishing, canoeing, and industrial purposes, including treated waste water discharges and untreated storm water discharges (Dynamac, 1993b). The Rock River ultimately discharges to the Mississippi River near Rock Island, Illinois (State of Illinois, 1991).

The municipal water supply for the City of Rockford is exclusively derived from 37 drift and bedrock wells. Two of these wells are located in the vicinity of the ProVet facility. The nearest municipal well is located 0.75 mile east of the facility near the Rock River. This well is screened from 44 to 97 feet bgs in the surficial drift aquifer. The second well is located 1 mile south of the facility. The second well is an open borehole from 207 feet to 1,127 feet bgs in the St. Peter Sandstone, and several lower sandstone and limestone aquifers (Dynamac, 1993a). Private wells outside the Rockford city limits draw from the upper bedrock aquifers (IGSD, 1981). There was no information available at the time of the PA/VSI regarding industrial wells in the city of Rockford.

Sensitive environments are not located at the facility. The nearest sensitive environment is an approximately 5-acre intermittently-exposed marshy area with an unconsolidated bottom located about 2,000 feet southeast of the facility. Other sensitive environments within 2 miles of the facility include a seasonally-flooded forested marshy area and a semipermanently-flooded excavated marshy area with an unconsolidated bottom, both approximately 5 acres in size and located about 0.5 mile northwest and north of the facility, respectively. In addition, there are 2 seasonally-flooded marshy areas with emergent vegetation and one temporarily-flooded forested marshy area, each approximately 2 acres in size and located about 0.7 mile northeast and north of the facility, respectively (USDI, 1987).

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the three SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and Dynamac observations. Figure 2 shows the SWMU locations.

SWMU 1 **Former Waste Storage Area**

Unit Description: The Former Waste Storage Area consists of an asphalt pad measuring approximately 20 feet by 35 feet. The unit is partially surrounded by a 3.5-foot concrete berm and an 8-foot high chain-link fence with a locked gate and is located outdoors on the east side of the building (see Figure 2 and Photo 1). This unit has a capacity of a combined total of 36 full 55-gallon drums, floor sweepings bags, and dust collector bags. The unit managed hazardous and nonhazardous wastes. The Hopkins representative could not provide any additional information pertaining to the construction materials or capacity of the floor sweepings bags and dust collector bags, or if any of the bags were placed into 55-gallon drums prior to transfer to SWMU 1. This unit underwent RCRA closure activities in 1984. IEPA approved the RCRA closure in August 1985. There are no drains in the vicinity of this unit.

Date of Startup: This unit began operation during the mid-1970s.

Date of Closure: This unit has been inactive since 1984 and underwent RCRA closure activities at that time. IEPA approved RCRA closure of this unit in August 1985.

Wastes Managed: This unit managed waste rodenticide (P001) and mixed waste rodenticide (P001, D013) in 55-gallon drums, floor sweepings bags, and dust collector bags; and spent solvent wash (D001, U002, U154, U239) in 55-gallon drums. In addition, this unit managed washwater (P001) and nonhazardous rodenticide waste in 55-gallon drums on a one-time basis. These wastes were stored for greater than 90 days and shipped off site for disposal.

Release Controls: This unit managed wastes in full 55-gallon drums, floor sweepings bags, and dust collector bags outdoors on an asphalt pad partially surrounded by a 3.5-foot high concrete berm and a chain-link fence with a locked gate.

History of Documented Releases:	No releases from this unit have been documented. During a 1985 RCRA closure inspection, IEPA collected a soil sample at this unit and at an area immediately east of this unit. Analysis of the composited sample indicated less than 0.2 ppm of warfarin to be present (IEPA, 1985b; Hopkins, 1985c).
Observations:	At the time of the VSI, the ground was covered with several inches of snow. Dynamac observed the location of the unit and that wooden pallets were being managed at the unit; however, due to the snow, the asphalt pad could not be directly observed.
SWMU 2	**Former Dust Collector**
Unit Description:	The Former Dust Collector consisted of a steel baghouse located outdoors on the north side of the tar and gravel roof of the building (see Figure 2). This unit was used to collect hazardous wastes from the air inside the building in dust collector bags which were transferred to SWMU 1 when full. The Hopkins representative could not provide any additional information pertaining to the construction materials or capacity of the dust collector bags or if they were placed into 55-gallon drums prior to transfer to SWMU 1. This unit was removed in 1984.
Date of Startup:	This unit began operation during the mid-1970s.
Date of Closure:	This unit was removed in 1984.
Wastes Managed:	This unit was used to collect waste rodenticide (P001) and mixed waste rodenticide (P001, D013) in dust collector bags prior to transfer to SWMU 1.
Release Controls:	This unit was constructed of steel and managed hazardous wastes in dust collector bags outdoors on the tar and gravel roof of the building.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	At the time of the VSI, Dynamac did not observe any visible evidence of the former location of this unit during the walk-through of the building. Dynamac did not go onto the roof of the building to observe the former location of this unit because the snow created a health and safety concern.

SWMU 3	**Former Floor Sweepings Accumulation Areas**
Unit Description:	The Former Floor Sweepings Accumulation Areas included several designated areas located indoors throughout the building on a concrete floor. Each designated area contained a floor sweepings bag or 55-gallon drum and was used to collect hazardous wastes. The Hopkins representative could not provide any additional information pertaining to the construction materials or capacity of the floor sweepings bags or if the bags were placed into 55-gallon drums prior to transfer to SWMU 1. These units ceased operations in 1984. There are no floor drains in the building.
Date of Startup:	This unit began operation during the mid-1970s.
Date of Closure:	This unit ceased operation when the facility was converted to a warehouse in 1984.
Wastes Managed:	These areas collected waste rodenticide (P001) and mixed waste rodenticide (P001, D013) prior to transfer to SWMU 1.
Release controls:	These areas collected waste in floor sweepings bags and 55-gallon drums indoors on a concrete floor with no floor drains.
History of Documented Releases:	There is no history of documented releases from these units.
Observations:	At the time of the VSI, Dynamac did not observe any visible evidence of the former locations of these areas during the walk-through of the building. There were no visible cracks in the concrete floor in any area observed by Dynamac during the walk-through of the building.

4.0 AREAS OF CONCERN

Dynamac identified two AOCs at the facility during the PA/VSI. These AOCs are discussed below; their locations are shown in Figure 2.

AOC 1 **Raw Material UST Area**

The Raw Material UST Area is located outdoors along the north side of the building and includes an approximate 30-foot by 40-foot area containing eight steel USTs ranging in size from 3,000 to 6,000 gallons (see Figure 2 and Photo 2). AOC 1 is surrounded by a 6-foot high chain-link fence with a locking gate. From the mid-1970s until 1982, two of the USTs contained kerosene, one contained naphtha, one contained mineral spirits, one contained petroleum distillates, and three contained trade name oils (Hopkins, 1982b). In 1983, a contractor opened and cleaned all but two of the USTs (IEPA, 1983b). There was no information available at the time of the PA/VSI in Hopkins, EPA, or IEPA files regarding the fate of the other two USTs. The USTs are no longer used but remain in place. At the time of the VSI, the area overlying the USTs was covered with snow. There was no additional information available during the VSI interview or in Hopkins, EPA, or IEPA files regarding any secondary containment features, leak testing, or soil sampling activities associated with the USTs.

AOC 2 **Gasoline UST Area**

The Gasoline UST Area is located outdoors in the center on the south side of the facility (see Figure 2 and Photo 3). An undocumented number of USTs containing gasoline used to fuel facility equipment were formerly located here. According to ProVet representatives, the USTs were removed during the mid-1980s. At the time of the VSI, the area overlying the former location of the USTs was covered with several inches of snow; however, ProVet representatives stated that the area was paved. There was no information available during the VSI interview or in Hopkins, EPA, or IEPA files regarding when the USTs were installed, the construction materials for the USTs, the number of USTs, any secondary containment features, any leak testing activities, details of the removal activities for the USTs, whether soil sampling associated with the removal was conducted, or if any contaminated soil was present or removed.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified three SWMUs and two AOCs at the facility. Background information on the facility's location; operations; waste generation and management; history of documented releases; regulatory history; environmental setting; and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. AOCs are discussed in Section 4.0. Following are Dynamac's conclusions and recommendations for each SWMU and AOC. Table 3, located at the end of this section, summarizes the SWMUs and AOCs at the facility and recommended further actions.

SWMU 1 **Former Waste Storage Area**

Conclusions: This unit consists of an asphalt pad measuring approximately 20 feet by 35 feet. The unit is partially surrounded by a 3.5-foot high concrete berm and an 8-foot high chain-link fence with a locked gate and is located outdoors. The unit has a capacity of a combined total of 36 full 55-gallon drums, floor sweepings bags, and dust collector bags. This unit managed hazardous and nonhazardous wastes and underwent RCRA closure activities in 1984. In 1985, IEPA collected a soil sample from the unit and an area immediately east of the unit (see Figure 2) (IEPA, 1985b). Analysis results of the composited samples indicated less than 0.2 ppm warfarin to be present (Hopkins, 1985c). IEPA approved the RCRA closure activities in August 1985. This unit has not been used since 1984 to manage waste and at the time of the VSI was being used to manage wooden pallets. There is no history of documented releases from this unit and there are no drains in the vicinity of this unit. The likelihood of a historical release to on-site soils, ground water, surface water, or air is low.

Recommendations: Dynamac recommends no further action for this unit at this time.

SWMU 2 **Former Dust Collector**

Conclusions: This unit consisted of a steel baghouse located outdoors on the north side of the tar and gravel roof of the building. This unit was used to collect hazardous particulates from the air inside the building in dust collector bags. The bags of this hazardous waste were transferred to SWMU 1 when full. The Hopkins representative could not provide any additional information

pertaining to the construction materials or capacity of the dust collector bags or if the bags were placed into 55-gallon drums prior to transfer to SWMU 1. This unit was removed in 1984. There is no history of documented releases from this unit. The likelihood of a historical release to on-site soils, ground water, surface water, or air is low.

Recommendations: Dynamac recommends no further action for this unit at this time.

SWMU 3 **Former Floor Sweepings Accumulation Areas**

Conclusions: This unit included several designated areas located indoors throughout the building on a concrete floor. These areas were used to collect hazardous wastes in 55-gallon drums and floor sweepings bags prior to transfer to SWMU 1. The Hopkins representative could not provide any additional information pertaining to the construction materials or capacity of the floor sweepings bags or if the bags were placed into 55-gallon drums prior to transfer to SWMU 1. These areas ceased operations in 1984. There is no history of documented releases from these areas and there are no floor drains in the building. The likelihood of a historical release to on-site soils, ground water, surface water, or air is low.

Recommendations: Dynamac recommends no further action for these units at this time.

AOC 1 **Raw Material UST Area**

Conclusions: AOC 1 is located outdoors and includes an approximate 30-foot by 40-foot area containing eight steel USTs ranging in size from 3,000 to 6,000 gallons. AOC 1 is surrounded by a 6-foot high chain-link fence with a locking gate. From the mid-1970s until 1982, the USTs contained kerosene, naphtha, mineral spirits, petroleum distillates, and trade name oils. In 1983, a contractor opened and cleaned all but two of the USTs. The USTs are no longer used but remain in place. There was no additional information available during the VSI interview or in Hopkins, EPA, or IEPA files regarding any secondary containment features, leak testing, or soil sampling activities associated with the USTs. The likelihood of a historical release to environmental media is summarized below.

On-Site Soils: Moderate. The USTs are constructed of steel and there is no documentation of any secondary containment features for the USTs or if the facility conducted any leak testing of the USTs.

Ground Water: Moderate. There is no documentation of any secondary containment features for the USTs or if the facility conducted any leak testing of the USTs. The soil in the vicinity of the facility consists of sand and gravel. The depth to ground water is not documented, but likely to be 10 to 15 feet bgs corresponding to the level of the Rock River. Therefore, potential releases to on-site soil would likely affect ground water at the facility.

Surface Water: Low. The USTs are located below the ground surface and the nearest surface water body, the Rock River, is located about 0.5 mile southeast of the facility. Surface water runoff at the facility is collected by an unnamed drainage ditch which flows southeast and discharges to the Rock River.

Air: Low. The USTs are located below the ground surface and contaminants are not likely to volatilize to the atmosphere.

Recommendations: Dynamac recommends that the facility conduct soil sampling for total petroleum hydrocarbons (TPH) to determine if any past releases have occurred.

AOC 2 **Gasoline UST Area**

Conclusions: AOC 2 is located outdoors and previously included an undocumented number of gasoline USTs. According to ProVet representatives, the USTs were removed during the mid-1980s. At the time of the VSI, the area overlying the former location of AOC 2 was covered with several inches of snow; however, ProVet representatives stated that the area is paved. There was no information available during the VSI interview or in Hopkins, EPA, or IEPA files regarding when the USTs were installed, the construction materials for the USTs, the number of USTs, any secondary containment features for the USTs, any leak testing activities, the details of the removal activities for the USTs, whether soil sampling associated with removal activities was conducted, or if any contaminated soil was present or removed. The likelihood of a historical release to environmental media is summarized below.

On-site Soils: Moderate. No information was available during the VSI interview or in Hopkins, EPA, or IEPA files regarding when the USTs were installed, the construction materials for the USTs, any secondary containment features for the USTs, or if the facility conducted any leak testing for the USTs.

Ground Water: Moderate. There is no documentation of any secondary containment features for the USTs or if the facility conducted any leak testing of the USTs. The soils in the vicinity of the facility consist of sand and gravel. The depth to ground water is not documented, but likely to be 10 to 15 feet bgs corresponding to the level of the Rock River. Therefore, potential releases to on-site soil would likely affect ground water at the facility.

Surface Water: Low. The USTs are located below the ground surface and the nearest surface water body, the Rock River, is located about 0.5 mile southeast of the facility. Surface water runoff at the facility is collected by an unnamed drainage ditch which flows southeast and discharges to the Rock River.

Air: Low. The USTs were located below the ground surface and contaminants are not likely to volatilize to the atmosphere.

Recommendations: Dynamac recommends that the facility conduct soil sampling for benzene, toluene, ethyl benzene, and xylene (BTEX) in the vicinity of AOC 2 to determine if a past release has occurred.

TABLE 3
SWMU AND AOC SUMMARY

SWMU	Dates of Operation	Evidence of Release	Recommended Further Action
1. Former Waste Storage Area	Mid-1970s to 1984	None	None at this time
2. Former Dust Collector	Mid-1970s to 1984	None	None at this time
3. Former Floor Sweepings Accumulation Areas	Mid-1970s to 1984	None	None at this time

AOC	Dates of Operation	Evidence of Release	Recommended Further Action
1. Raw Material UST Area	Mid-1970s to 1982	None	Conduct soil sampling for TPH to determine if past releases have occurred
2. Gasoline UST Area	Unknown to mid-1980s	None	Conduct soil sampling for BTEX to determine if past releases have occurred

REFERENCES

Dynamac Corporation (Dynamac), 1992. Telephone conversation between Mr. Lee Schwalenberg, Plant Manager for the Hopkins facility in Randolph, Wisconsin, and Dawn Thompson, Dynamac, regarding former Hopkins operations at the Rockford, Illinois, facility, December 15.

Dynamac, 1993a. Telephone conversation between Wally Parson, Rockford Water Department and Russ Crittenden, Dynamac, regarding ground water uses in Rockford, January 11.

Dynamac, 1993b. Telephone conversation between Eugene Forster, Illinois Environmental Protection Agency (IEPA), and Dawn Thompson, Dynamac, regarding uses of the Rock River, January 11.

Federal Emergency Management Agency (FEMA), 1982. Flood insurance rate map for the City of Rockford, Winnebago County, Illinois.

Hackett, J.E., and R.E. Bergstrom, 1956. "Groundwater in Western Illinois," Illinois State Geological Survey, Circular 207.

Hopkins Agricultural Chemical Company (Hopkins), 1980a. Notification of Hazardous Waste Activity, signed by William M. Mahlburg, Regulatory Compliance Specialist, August 15.

Hopkins, 1980b. RCRA Part A permit application (Part A), signed by James E. Hopkins, President, November 17.

Hopkins, 1982a. Letter to EPA explaining that the Part A T04 code referred to drum cleaning activities and was not considered a treatment process, from Charles Jones, April 28.

Hopkins, 1982b. RCRA closure plan identifying the empty raw material underground storage tanks (UST) and the former contents, September 15.

Hopkins, 1984. "Generator Annual Hazardous Waste Report" for 1983, signed by Charles P. Jones, Director of Environmental & Safety, April 10.

Hopkins, 1985a. Hopkins response to IEPA's January 7, 1985, letter citing deficiencies, from William M. Mahlburg, Regulatory & Environmental Manager, January 17.

Hopkins, 1985b. "Generator Annual Hazardous Waste Report" for 1984, signed by W. M. Malhburg, Regulatory Manager, February 27.

REFERENCES (continued)

Hopkins, 1985c. Analysis results for the four composited soil samples collected on April 17, 1985, from Lee Schwalenberg, Director of Manufacturing, July 3.

Hughes, G.M., P. Kraatz, and R.A. Landon, 1966. "Bedrock Aquifers of Northeastern Illinois," Illinois State Geological Survey, Circular 406.

IEPA, 1982. Complaint investigation report discussing that the complaint of buried drums was accurate but occurred in Wisconsin and not Illinois, from Pamela D. LaPinto, August 2.

IEPA, 1983a. RCRA inspection report verifying that RCRA closure was proceeding according to the closure plan, indicating that Hopkins never stored wastes indoors, and identifying the location of SWMU 1 adjacent to the Part A location of the S01 unit, from Pamela D. LaPinto, September 7.

IEPA, 1983b. RCRA inspection discussing three soil samples collected, the eight raw material USTs, and the location of SWMU 1, from Pamela D. LaPinto, October 18.

IEPA, 1983c. Letter to Hopkins approving the facility's RCRA closure plan, from Lawrence W. Eastep, Division of Land Pollution Control, October 25.

IEPA, 1984. Compliance Inquiry Letter to Hopkins citing the facility for failing to submit a 1983 Annual Hazardous Waste Report, from Gregory T. Zak, Division of Land Pollution Control, April 18.

IEPA, 1985a. Letter notifying Hopkins that after reviewing information received from the facility the following deficiencies were noted; failure to maintain liability coverage, failure to provide a closure plan, failure to submit a closure cost estimate, and failure to provide financial assurance; from Lawrence W. Eastep, Division of Land Pollution Control, January 7.

IEPA, 1985b. RCRA inspection report discussing that three soil samples collected on October 18, 1983, by IEPA had never been analyzed and that four additional soil samples were collected from the same areas, from P. M. Luedtke, April 17.

IEPA, 1985c. Letter to Hopkins approving RCRA closure activities, from Lawrence W. Eastep, Division of Land Pollution Control, August 20.

Illinois Geological Survey Division (IGSD), 1981. "Geologic Report On The Ground-Water Conditions For An Industrial Supply In Winnebago County, Illinois", by William G. Dixon, Jr., Associate Geologist, March 13.

REFERENCES (continued)

Lineback, J.A., 1979. Quaternary Deposits in Illinois, Map 1:500,000.

Rapps, M. Associates (Rapps), 1985. Letter to IEPA stating that Hopkins had ceased operations and that RCRA closure activities had been completed according to the closure plan; attachments include analysis of the RCRA closure washwater and copies of manifests for removal of nonhazardous rodenticide waste and washwater (P001), from Michael W. Rapps, P.E., February 26.

National Oceanic and Atmospheric Administration (NOAA), 1979. Climatic Atlas of the U.S., Ashville, North Carolina.

NOAA, 1990. Local Climatological Data for O'Hare International Airport, Chicago, Illinois.

Soil Conservation Service (SCS), 1980. Soil Survey of Winnebago County, Illinois.

State of Illinois, 1991. Official Highway Map for Illinois.

U.S. Department of the Interior (USDI), 1987. National Wetlands Inventory Map, 1:24,000 scale, Rockford North, Illinois Quadrangle. Based on aerial photographs taken in November 1980.

U.S. Geological Survey (USGS), 1971. 7.5 minute series topographic map, 1:24,000 scale, Rockford North, Illinois Quadrangle. Photorevised 1976.

ATTACHMENT A

EPA PRELIMINARY ASSESSMENT
FORM 2070-12

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
IL	ILD 057 829 780

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site)	02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER
ProVet Companies, Inc. (formerly Hopkins Agricultural Chemical Company)	4801 Shepherd Trail

03 CITY	04 STATE	05 ZIP CODE	06 COUNTY	07 COUNTY CODE	08 CONG DIST
Rockford	IL	61103	Winnebago		

09 COORDINATES: LATITUDE 42° 19' 25" N LONGITUDE 89° 04' 25" W

10 DIRECTIONS TO SITE (Starting from nearest public road)

Take I-90 West until Riverside Boulevard exit. Travel west on Riverside Boulevard to North Main (a.k.a Highway 2) and turn right. At the second stop sign turn right, this leads into a industrial park; continue until the first chance to turn left. The facility is the second building on the right.

III. RESPONSIBLE PARTIES

01 OWNER (If known)	02 STREET (Business, mailing residential)
Mr. James Sheldon	1701 National Avenue

03 CITY	04 STATE	05 ZIP CODE	06 TELEPHONE NUMBER
Rockford	IL	61103	Unlisted

07 OPERATOR (If known and different from owner)	08 STREET (Business, mailing, residential)
ProVet Companies, Inc.	4801 Shepherd Trail

09 CITY	10 STATE	11 ZIP CODE	12 TELEPHONE NUMBER
Rockford	IL	61103	(815) 877-0209

13 TYPE OF OWNERSHIP (Check one)

■ A. PRIVATE □ B. FEDERAL: (Agency name) □ C. STATE □ D. COUNTY □ E. MUNICIPAL

□ F. OTHER _____ (Specify) □ G. UNKNOWN

14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)

■ A. RCRA 3010 DATE RECEIVED: MONTH 08 DAY 15 YEAR 80 B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED: ___/___/___ MONTH DAY YEAR □ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION

■ YES DATE 12 / 10 / 92
□ NO

BY (Check all that apply)

□ A. EPA ■ B. EPA CONTRACTOR □ C. STATE □ D. OTHER CONTRACTOR
□ E. LOCAL HEALTH OFFICIAL □ F. OTHER: _____ (Specify)

CONTRACTOR NAME(S): Dynamac Corporation

02 SITE STATUS (Check one)

■ A. ACTIVE □ B. INACTIVE □ C. UNKNOWN

03 YEARS OF OPERATION

Mid-1970s / Present (BEGINNING YEAR / ENDING YEAR) □ UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED

Currently no solid waste, other than municipal trash, is being generated at the facility. From the mid-1970s until 1984, the facility formulated and packaged rodenticides. The facility formerly stored raw materials outdoors in steel USTs and stored hazardous and nonhazardous wastes outdoors in 55-gallon drums and bags on an asphalt pad.

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

There is a potential for hazardous constituents from USTs at the facility which formerly contained gasoline, kerosene, naphtha, mineral spirits, petroleum distillates, and trade name oils to have impacted on-site soils. The USTs formerly containing gasoline were removed during the mid-1980s.

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.)

□ A. HIGH (Inspection required promptly) □ B. MEDIUM (Inspection required) ■ C. LOW (Inspect on time-available basis) □ D. NONE (No further action needed; complete current disposition form)

VI. INFORMATION AVAILABLE FROM

01 CONTACT	02 OF (Agency/Organization)	03 TELEPHONE NUMBER
Kevin Pierard	U.S. EPA	(312) 886-4448

04 PERSON RESPONSIBLE FOR ASSESSMENT	05 AGENCY	06 ORGANIZATION	07 TELEPHONE NUMBER	08 DATE
Dawn Thompson		Dynamac Corporation	(312) 466-0222	12 / 10 / 92 MONTH DAY YEAR

ATTACHMENT B

VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

ProVet Companies, Inc. (ProVet)
(Formerly Hopkins Agricultural
Chemical Company)
4801 Shepherd Trail
Rockford, Illinois 61103
ILD 057 829 780

Primary Facility Representative: Representative Telephone No.:	Craig Anderson, Controller, ProVet (815) 877-0209
Additional Facility Representatives:	Lois Macavley, Warehouse Manager, ProVet George Rankin, General Manager, ProVet
Inspection Team:	Dawn Thompson, Dynamac Corporation Russ Crittenden, Dynamac Corporation
Photographer:	Dawn Thompson, Dynamac Corporation
Weather Conditions:	Cloudy, snow flurries, snow-covered ground, approximately 30° F
Summary of Activities:	The visual site inspection (VSI) began at 10:50 a.m. with an introductory meeting. The inspection team explained the purpose of the VSI and the agenda for the visit. Facility representatives then explained ProVet's operations, solid wastes generated, and release history. The VSI tour began at 11:40 a.m. The VSI tour included a walk-through of the building and associated outdoor property. The inspection team observed the location of the Raw Material Underground Storage Tank (UST) Area (AOC 1), and the former location of the Gasoline UST Area (AOC 2); however, several inches of snow was covering the area overlying these units. Dynamac did not observe any visible evidence of the Former Dust Collector (SWMU 2) during the walk-through of the building; however, Dynamac did not go onto the roof of the building because

the snow created a health and safety concern. In addition, Dynamac did not observe any visible evidence of the Former Floor Sweepings Accumulation Areas (SWMU 3) during the walk-through. The VSI tour concluded at 12:15 p.m., after which the inspection team held an exit meeting with ProVet representatives. The VSI was completed and the inspection team left the facility at 12:30 p.m.

The inspection team stopped at the IEPA regional office in Rockford and spoke with Bob Wengrow, Regional Manager, Division of Land Pollution Control about the facility. Dynamac observed the IEPA regional office files and identified one additional SWMU. Dynamac returned to the facility at 1:00 p.m. to observe the location of the Former Waste Storage Area (SWMU 1). The inspection team left a written message for Mr. Anderson since he had left for lunch. The inspection team left the facility at 1:15p.m.

Photo No.: 1 **Location:** SWMU 1
Orientation: North **Date:** December 10, 1992
Description: Location of the Former Waste Storage Area inside the chain-link fence. The area is currently used to store wooden pallets.

Photo No.: 2 **Location:** AOC 1
Orientation: Northeast **Date:** December 10, 1992
Description: Location of the Raw Material Underground Storage Tank (UST) Area is the area enclosed by the chain-link fence. Please note that UST vents appear in the photograph.

Photo No.: 3 **Location:** AOC 2
Orientation: South **Date:** December 10, 1992
Description: The Gasoline UST Area is approximately between the two cars. The area above the former USTs is currently used for facility parking.

END OF PHOTOGRAPHS

ATTACHMENT C

VISUAL SITE INSPECTION FIELD NOTES

December 10, 1992

Hopkins / Pro Vet facility
Rockford, IL

Inspectors: Dawn Thompson, Dynamac lead
Russ Crittenden

Weather: cloudy, 30°, snow flurries

Arrived at facility at 10:50 am. Met with Craig Anderson, controller, and Lois Macauley, warehouse manager

Dawn gave introduction on purpose and scope of VSI.

Dawn began to ask questions regarding facility size & and operations. Now sell supplies to veterenarians & pet store as a warehouse. Hopkins stopped manufacturing in mid-80's or so

PCB's — none known
Asbestos — doesn't know

Runoff goes to ditch on north.

VST's — some emptied, cleaned and abandoned in place in mid-80's tanks held oils used in manufacturing (emulsifiers).
#, Size, construction, documentation unknown by Mr. Anderson
Mr. George Rankin, General Manager, said VST's removed.
and would look for documentation, Only gasoline VSTs remo

12/10/92

December 10, 1992 Pro Vet

Wastes — some breakage, spoilage, outdated materials some medicines, parts; Don't know if things are RCRA haz. wastes
- Some returned to manufacturer for replacement.
- Only rarely discarded.
- Mr Anderson does know how they handle the stuff
- No current employees have dealt with these wastes.
- Accumulate these things in a central area.
- Mr. Rankin said always returned to vendors.

Began walk-through at ~~HORC~~ 1140 am.

First stop - indoor storage area shown in Pict A

#1 SE - dogfood racks current use.

Then went to outdoor area shown in Part A.

#2 - W - wood pallets on gravel

Then saw returns room where products are sorted for return to vendors.

Materials - partial list

#3 - E
#4 - NW

pet shampoo, flea spray, skin medicine, metronidazole, insecticide ear wash, Calphosan (injection), Bovine medicine, Antibiotics for poultry

Approx 750 to 1000 separate vendors.

12/10/92

Then went to product UST area on north side.
6 vents in fenced area ~30' x 40'

#5 N

Last area was gasoline USTs area on south side

#6 N
#7 S

Wrap-up meeting started at ~12:15 pm.

Requested that the facility locate and send us info on UST closures and removals.

Left facility at 12:30 pm after thanking facility reps.

Went to IEPA regional office to discuss facility with Bob Alengrow. He showed us the filed which contained an Illinois Haz. Waste Permit Application. This form contained a facility map with different SWMU locations that were indicated on Part A.

Returned to facility at 1:00 pm to photograph areas indicated on Illinois permit application.

#8 N , #9 N ~~drum~~ waste storage area w/ 3.5' berm/gate and fence to 8'. Area 20' x 35' (approx.); contained wood palle

#10 W North side of building where dust collector located.

[signature] 10/10/02

Mr. Craig Anderson was out to lunch so we left a note explaining our return and extra photos.

Left facility at 1:15 pm.

Ross Cuttle

12/10/92

12/4/92
RECEIVED
WMD RCRA
RECORD CENTER

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

December 3, 1992

HRE-8J

Mr. Craig Anderson
Controller
ProVet Company
4801 Shepherd Trail
Rockford, Illinois 61103

Re: Visual Site Inspection
ProVet Company
(Former Hopkins Agricultural Chemical Company)
Rockford, Illinois
ILD 057 829 780

Dear Mr. Anderson:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment including a Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) Section 3007 and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA) Section 104(e). The referenced facility has generated, treated, stored, or disposed of hazardous waste subject to RCRA. The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern (AOCs) to make a cursory determination of their condition by visual observation. The definitions of SWMUs and AOCs are included in attachment I. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of units at the facility and the waste management practices used.

The VSI has been tentatively scheduled for December 10, 1992, at 9:00 a.m., at the Rockford facility location. The inspection team will consist of Dawn Thompson and Joseph Weslock of Dynamac Corporation, contractors for the U.S. EPA. Representatives of the Illinois Environmental Protection Agency (IEPA) may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

The U.S. EPA recommends that personnel who are familiar with present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, environmental permits (air, NPDES), manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI.

If you have any questions, please contact me at (312) 886-4448 or Francene Harris at (312) 886-2884. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the Conclusions and Executive Summary portions, will be sent when the report is available.

Sincerely yours,

Kevin M. Pierard, Chief
OH/MN Technical Enforcement Section

attachment

cc: Larry Eastep, Permit Section, IEPA
Bob Wengrow, Division of Land Pollution Control, IEPA
Phil Trap, Chief Controller, ProVet

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REGION 5
77 WEST JACKSON BOULEVARD
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Kevin M. Pierard, Chief
OH/MN Technical Enforcement Section

attachment

cc: Larry Eastep, Permit Section, IEPA
Bob Wengrow, Division of Land Pollution Control, IEPA
Phil Trap, Chief Controller, ProVet

ILD 057 829 780

Hopkins
agricultural products div.
P.O. Box 7532/537 Atlas Avenue (608) 221-6211
Madison, WI 53707

Illinois

Out of Business

January 29, 1986 CERTIFIED MAIL

RCRA Activities
Region V
PO Box A3587
Attention: ATKJG
Chicago, IL 60690

Dear Sirs:

Attached is the completed form concerning hazardous waste discharges as requested in your letter recieved by us on January 28, 1986.

If there are any questions or comments, please feel free to contact me.

Sincerely,

Lee D. Schwalenberg

Lee D. Schwalenberg
Director of Manufacturing

LDS/bjp

cc: W. Maik
D. Burchett-UAP

CERTIFICATION REGARDING POTENTIAL RELEASES FROM
SOLID WASTE MANAGEMENT UNITS

FACILITY NAME: Hopkins Agricultural Chemical Co /dba Cole Grower Service

EPA I.D. NUMBER: ILD 057829780

LOCATION CITY: Madison

STATE: Wisconsin

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTE UNITS CURRENTLY SHOWN IN YOUR PART A APPLICATION

	YES	NO
° Landfill		X
° Surface Impoundment		X
° Land Farm		X
° Waste Pile		X
° Incinerator		X
° Storage Tank (Above Ground)		X
° Storage Tank (Underground)		X
° Container Storage Area		X
° Injection Wells		X
° Wastewater Treatment Units		X
° Transfer Stations		X
° Waste Recycling Operations		X
° Waste Treatment, Detoxification		X
° Other _____		

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed of and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions and location at facility. Provide a site plan if available.

NOTE: Hazardous wastes are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.

3. For the units noted in Number 1 above and also those hazardous waste units in your Part A application, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or may still be occurring.

   Please provide the following information

   a. Date of release
   b. Type of waste released
   c. Quantity or volume of waste released
   d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

   To the best of our knowledge there is not nor never has been any release of hazardous waste or constituents to the environment from this facility.

4. In regard to the prior or continuing releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submittal is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (42 U.S.C. 6902 et seq. and 40 CFR 270.11(d))

Lee D. Schwalenberg-Director of Mfg.
Typed Name and Title

Lee D. Schwalenberg
Signature

January 29, 1986
Date